962615

ON-SCENE COORDINATOR'S REPORT
CERCLA IMMEDIATE REMOVAL PROJECT #2

OLD MILL SITE
ROCK CREEK, OHIO

April 2 - April 16, 1984

Joseph J. Fredle
On-Scene Coordinator

Prepared by:

U.S. Environmental Protection Agency
Region V
Eastern District Office
25089 Center Ridge Road
Westlake, Ohio

June 1984

PREFACE

This report factually documents the response action initiated by the U.S. government at the Old Mill site in Rock Creek, Ohio. The format of this report follows the outline specified in the National Contingency Plan.

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1.0 SUMMARY OF EVENTS

1.1 Location

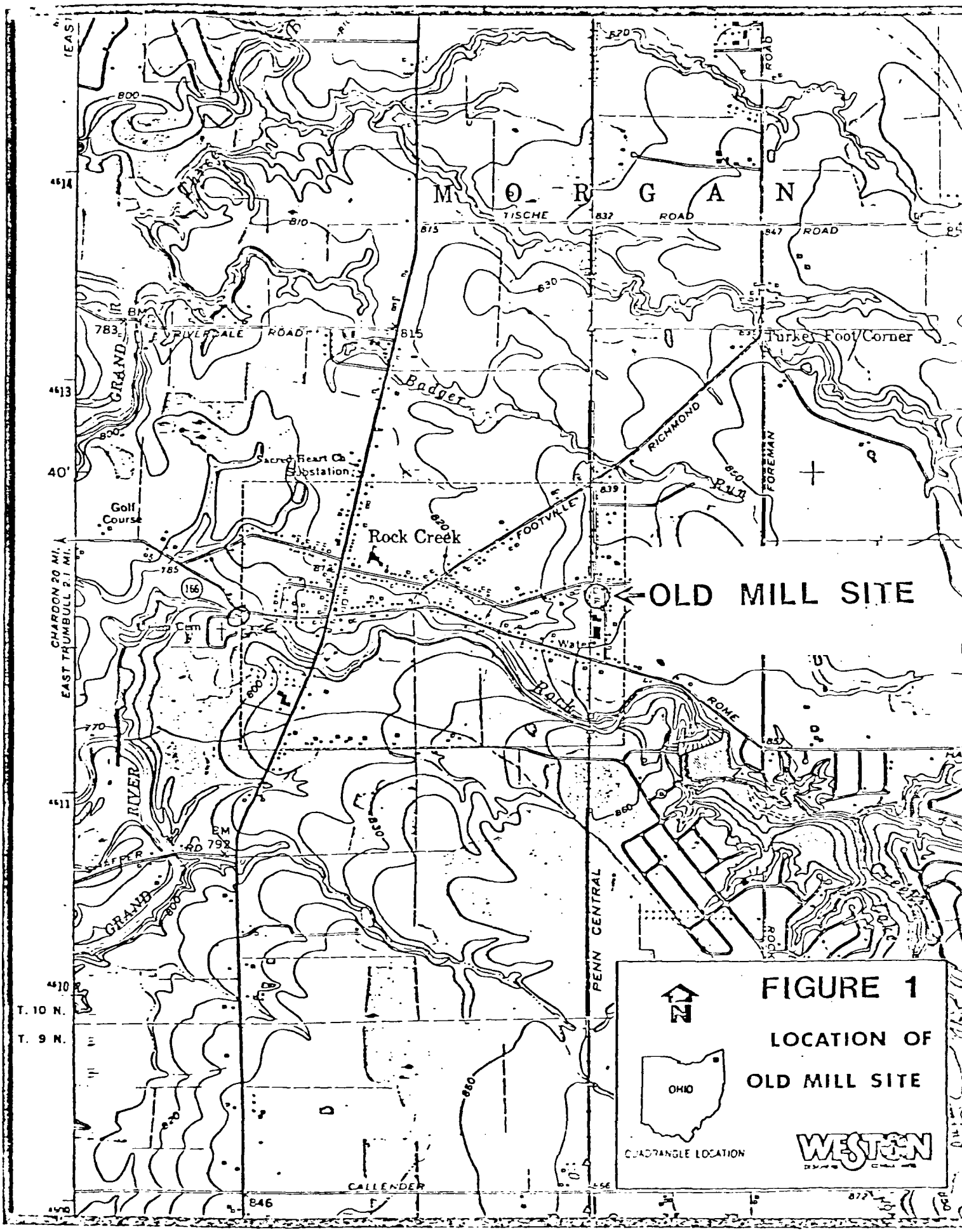
The Old Mill site is located at latitude 41°39'12" and longitude 80°50'48" in the south-central portion of Morgan Township, Ashtabula County, Ohio (Figure 1). Situated at the intersection of Station Street and Mill Street in Rock Creek, Ohio, the two acre site is bordered by a small wooded area to the north, by a residential area to the east, by the Rock Creek Aluminum Company to the south, and by the Penn-Central Railroad right-of-way and a livestock feed manufacturer to the west (Figure 2). An unnamed tributary flows under the site's southern section via an aqueduct and continues to Rock Creek which is approximately 1500 feet from the site boundaries.

1.2 Initial Situation

The Old Mill site was first brought to the attention of the U.S. Environmental Protection Agency (U.S. EPA) in June of 1979. At the request of the Ohio Environmental Protection Agency (OEPA), personnel from both agencies conducted a joint inspection of the Old Mill site and adjacent property owned by Mr. Robert Henfield and Mr. William Kraus, respectively. At the time of the initial inspection, Mr. Jack Webb was manufacturing and packaging potting soil at the Old Mill site. This process included the manufacture of small white beads from urea formaldehyde. Mr. Webb, in an unrelated enterprise, was also storing 300 to 500 drums on the Kraus property (which he was leasing) and approximately 500 drums in and around the abandoned grain storage facility on the Old Mill site.

In February of 1980, the U.S. EPA learned that all but a few drums containing solids had been moved from the Kraus site to the Old Mill site by Mr. Webb. This move resulted in the consolidation of approximately 1,200 drums, in various stages of deterioration, containing solids, solvents, paint sludges and other waste. Although the situation posed a threat to area residents, it was not possible to take any federal cleanup action due to the lack of a funding source.

Subsequent to the expansion of the use of the 311(k) fund under the Clean Water Act and the passage of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), site cleanup measures were undertaken. The cleanup began on November 21, 1980, and was completed on November 12, 1982, at a cost of $163,977.83. Of this total, $9,536.00 was funded by the 311(k) fund and $154,441.83 was


MORGAN
TISCHE ROAD
RIVERDALE ROAD
Turkey Foot Corner
Badger Run
RICHMOND
FOREMAN
Sacred Heart Ch
Substation
Golf Course
Rock Creek
FOOTVILLE
OLD MILL SITE
Cem
Water
Rock
ROME
GRAND RIVER
PENN CENTRAL
CALLENDER
CHARDON 20 MI.
EAST THUMBULL 2.1 MI.
T. 10 N.
T. 9 N.
FIGURE 1
LOCATION OF
OLD MILL SITE
OHIO
QUADRANGLE LOCATION
WESTON

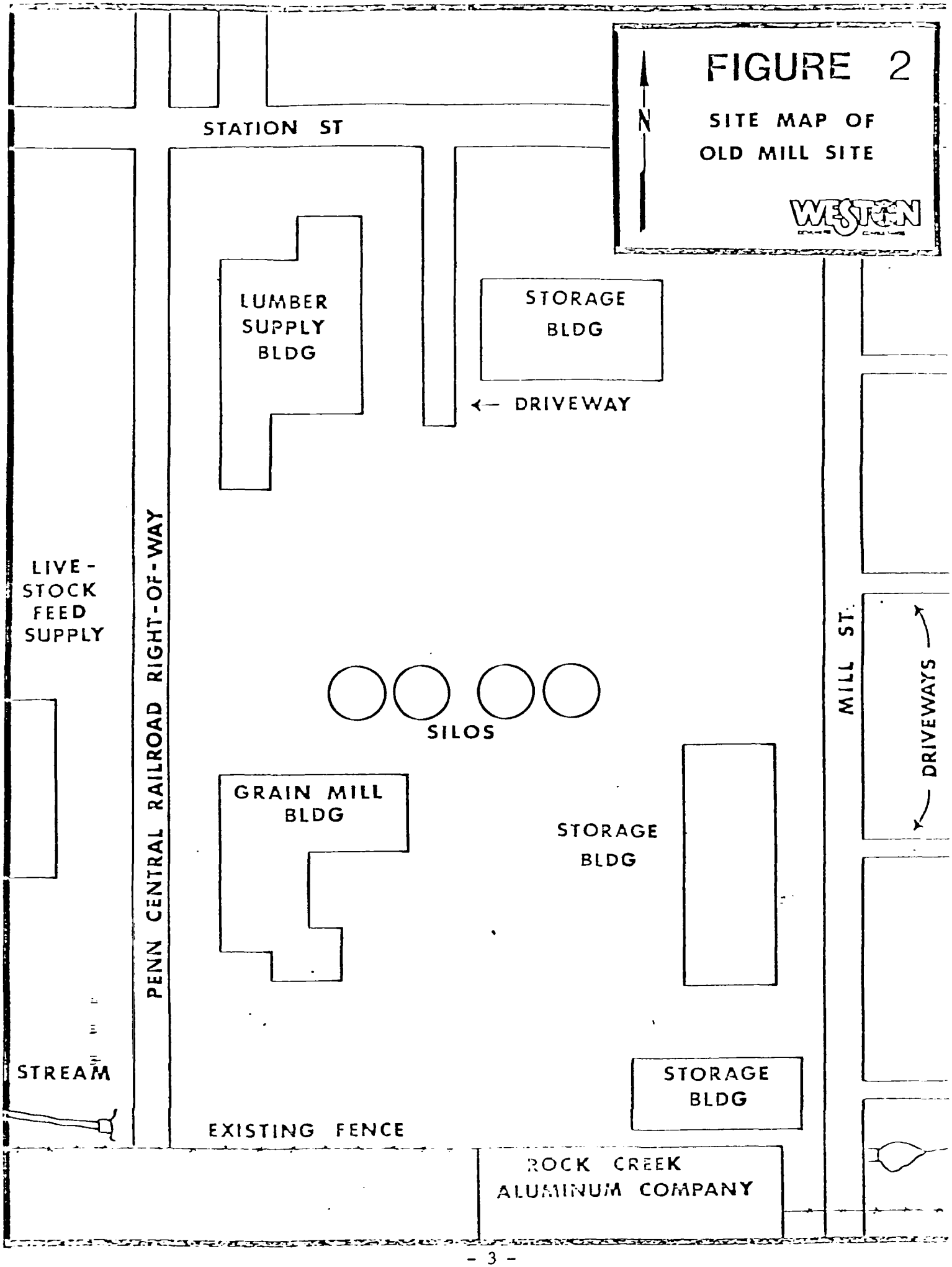


FIGURE 2
SITE MAP OF
OLD MILL SITE
WESTERN
N
STATION ST
LUMBER
SUPPLY
BLDG
STORAGE
BLDG
DRIVEWAY
LIVE-
STOCK
FEED
SUPPLY
PENN CENTRAL RAILROAD RIGHT-OF-WAY
MILL ST.
DRIVEWAYS
SILOS
GRAIN MILL
BLDG
STORAGE
BLDG
STREAM
STORAGE
BLDG
EXISTING FENCE
ROCK CREEK
ALUMINUM COMPANY

allocated through the Hazardous Substance Response Trust Fund (Trust Fund). This immediate removal action resulted in the removal and proper disposal of: 4,000 gallons of PCB liquids; 64 PCB-contaminated drums; 9,500 gallons of flammable liquids; 650 gallons of organic liquids; 406 drums of solidified sludges; 305 drums of residual material; and, 80 cubic yards of contaminated soil.

After completion of the first removal action, the OSC (Mr. Joseph Fredle) initiated a sampling effort to further define the health threat posed by the remaining contaminated soils at the unsecured Old Mill site. It should be noted that this effort was undertaken prior to initiation of the Remedial Investigation/Feasibility Study (RIFS). Prior to actual sample collection, a sampling plan had to be developed to accurately assess the extent and magnitude of soil contamination resulting from previous activities on the site. On Wednesday, June 22, 1983, the OSC, Mark Henke (Technical Assistance Team - TAT), Debbie Berg (Ohio EPA) and Gary Gifford (Ohio EPA) met and devised a sampling plan for the collection of soil samples. This plan was formally presented in a memorandum, dated June 23, 1983, from the Technical Assistance Team to Robert Bowden (Appendix M).

During the period of June 29 through July 1, 1983, TAT conducted environmental sampling in accordance with the sampling plan. A total of 42, 36 and 4 samples were taken for organic, inorganic and EP toxicity analysis, respectively. With the exception of volatile organics analyses on 22 samples, which were cancelled due to analytical delays, all analytical results were received by November 23, 1983. A discussion of the sample collection, sample analysis results, and data interpretation efforts are summarized in a memorandum dated February 14, 1984, from the Technical Assistance Team to Mr. Joseph Fredle (Appendix K).

As the data became available, OSC Fredle began assessing the need for an additional immediate removal at the Old Mill site. To assist him in this effort were staff from both state and federal agencies, including Ms. Debbie Berg (OEPA), Mr. Gregg Kulma (U.S. EPA), Mr. George Prince (U.S. EPA - Emergency Response Team) and Ms. Louise Fabinski (Health and Human Services - Centers for Disease Control). These officials were provided with summaries of the analytical results in forms similar to those presented in the memorandum dated February 14, 1984, discussed above. Both Mr. Prince and Ms. Georgi Jones (for Ms. Louise Fabinski) conducted formal reviews of the soil data and submitted their findings to the OSC for consideration (Appendix M).

To both clarify the positions of the U.S. EPA-ERT and the Centers for the Disease Control (CDC), and to further evaluate the threats to human health and the environment posed by conditions at the Old Mill site, OSC Fredle initiated a meeting of the Regional Response Team (RRT). The RRT convened at 1300 hours on January 31, 1984, at the U.S. EPA Eastern District Office, 25089 Center Ridge Road, Westlake, Ohio. The list of those persons in attendance (Table 1) and the meeting minutes can be found in Appendix O).

Based upon review of the soil data and clarifying remarks by the U.S. EPA-ERT and CDC[1], the RRT determined that the site posed an imminent and substantial threat to human health and the environment and that a second immediate removal would be required prior to initiation of any remedial measures. The RRT recommended that an Action Memorandum be prepared to initiate an immediate removal for the construction of a fence around the Old Mill site in Rock Creek, Ohio.

On February 22, 1984, an Administrative Order was sent to Mr. Jack Webb at [redacted] (Appendix B). The order required Mr. Webb to restrict access to the site by constructing a chain link fence, at least six feet high, around the perimeter of the facility. Mr. Webb replied that, due to the lack of funds, he could not erect a fence. Thus, on March 7, 1984, a total of $12,000 was granted for an immediate removal action at the Old Mill site. Appendix A contains the signed Action Memorandum authorizing the expenditure of these funds.

1.3 Federal Cleanup Action

Competitive bids for construction of the fence surrounding the Old Mill site were solicited by the Zone 3 Emergency Response Cleanup Services (ERCS) contractor, PEDCO Environmental, Inc. After being notified that Thomas Fence Company, Inc., had been awarded the contract, Mr. Joseph Fredle, the designated OSC, and Mr. Scott Springer (TAT) met with Mr. Glenn Thomas of Thomas Fence at the site to establish project approach, schedule and personnel requirements. During the meeting, held on March 21, 1984, both alternative fence lines and fence types (e.g., fence with top rail, fence with tension wire, etc.) were discussed. On March 22, 1984, OSC Fredle, after evaluating each option, decided to place the fence as shown in Figure 3. In addition, the fence would be installed according to the following specifications:

[1] Appendix M contains a follow-up memorandum dated February 6, 1984, which clarifies CDC's position regarding the health threats posed by the Old Mill site.

TABLE 1

ATTENDEES AT THE REGIONAL RESPONSE TEAM MEETING
HELD ON JANUARY 31, 1984, REGARDING THE OLD MILL SITE,
ROCK CREEK, OHIO

Name	Affiliation
Robert J. Bowden-RRT Chair	U.S. EPA-Central District Office
Jeffry T. deRoche	U.S. Geological Survey
Joseph Fredle	U.S. EPA-Eastern District Office
Gary Gifford	OEPA-Northeast District Office
Roger Hannahs	Ohio EPA-Central Office
Chuck Hart	Ashtabula Co. Health Dept.
Vanessa Musgrave	U.S. EPA-Community Relations
Dan Papcke	U.S. EPA-Eastern District Office
George R. Prince	EPA-Emergency Response Team
Allan Razem	U.S. Geological Survey
Scott Springer	Roy F. Weston, Inc.-Technical Assistant Team
Pierre Talbert	U.S. EPA-Office of Regional Counsel
Mary Tyson	U.S. EPA-Remedial Response Branch
A.R. Winkelhofer	U.S. EPA-Eastern District Office

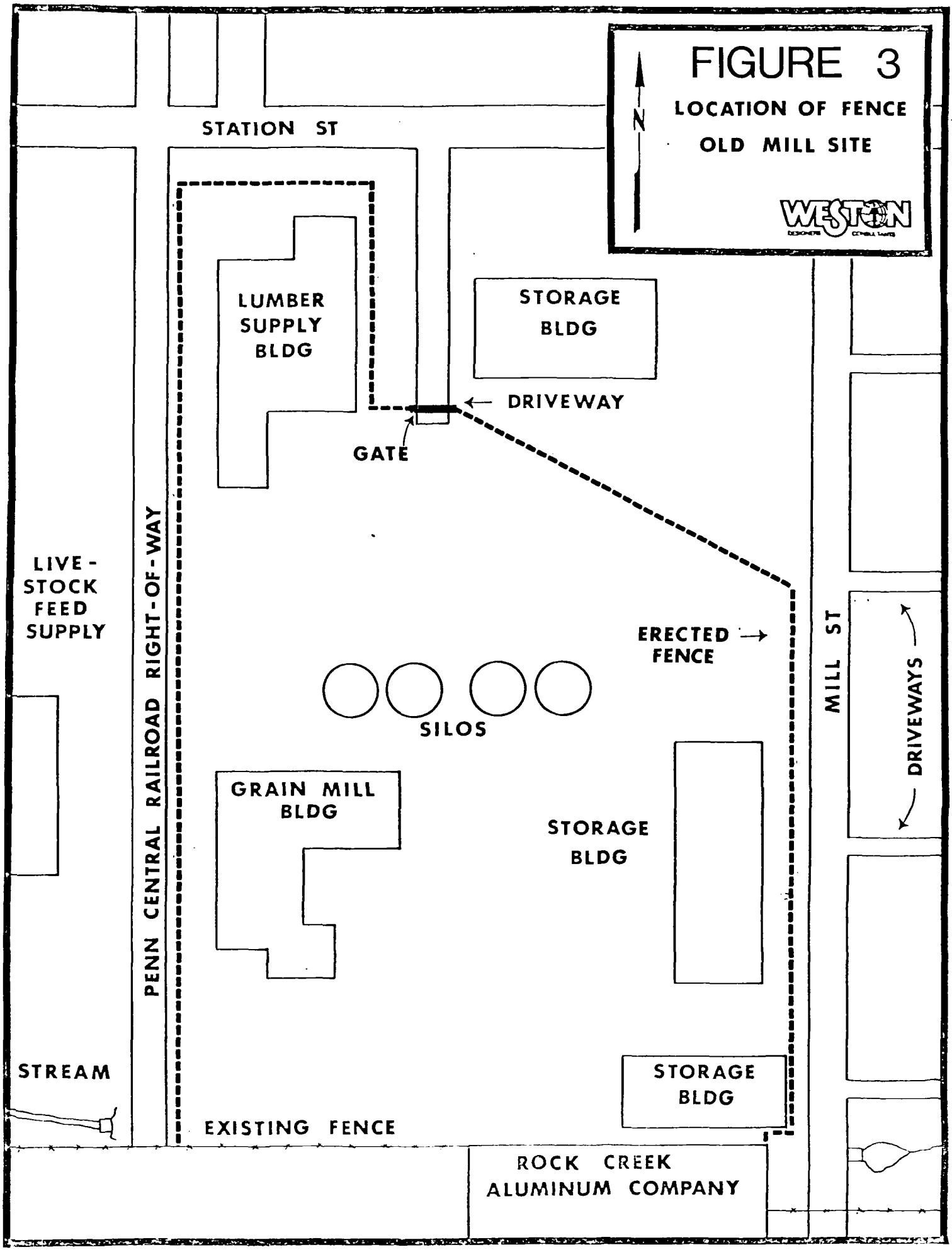


FIGURE 3
LOCATION OF FENCE
OLD MILL SITE
N
WESTON
STATION ST
LUMBER SUPPLY BLDG
STORAGE BLDG
DRIVEWAY
GATE
LIVE-STOCK FEED SUPPLY
PENN CENTRAL RAILROAD RIGHT-OF-WAY
ERECTED FENCE
MILL ST
DRIVEWAYS
SILOS
GRAIN MILL BLDG
STORAGE BLDG
STREAM
STORAGE BLDG
EXISTING FENCE
ROCK CREEK ALUMINUM COMPANY

- o 9 gauge, 6' cyclone fabric
- o Full top rail and bracing--no tension wires
- o 2" line posts
- o 3" corner posts
- o 3 strands barbed wire (4 point)
- o Line posts at 10' intervals, cemented in
- o 1-12" double drive gate
- o 1-3' panel placed between fence and Rock Creek Aluminum Company
- o 6 "No Trespassing" signs

Week One - April 2 through 5, 1984

Removal activities began on April 2, 1984, for this, the second removal action at the Old Mill site. Level of personnel protection was established as Level D by the OSC as all work was conducted beyond the areas known to be contaminated.

Prior to laying out the fence line, Skidmore Excavating was retained to clear the proposed fence line as established previously. Clearing was done with an International TD-7 bulldozer and was accomplished in less than 3.5 hours. During the remainder of the week, Thomas Fence personnel installed, in cement, a total of 94 line posts and 8 corner posts (refer to photographs in Appendix J). This involved the following: preparing the fence corridor; laying out the fence line; marking all fence post locations (10' centers); drilling all fence post holes with mechanical auger (line posts - 2.5' deep, 9" diameter; corner posts - 3' deep, 12" diameter); excavating fence post holes manually in final preparation for fence post placement (this includes manual excavation of those holes at which rock was encountered); setting fence posts for first time (includes adjusting height and plumb); filling each fence post hole with cement until it is within 1" of natural grade; setting fence posts for second time; and, setting fence post for the third and final time. After installation of the fence posts, the cement was allowed to set for 4 days before work continued.

Week Two - April 10 through 13, 1984

During the second week of the immediate removal action, Thomas Fence personnel installed all of the top rail, all corner braces, barb arms and fence ties (approximately 2,000), and the 12' main gate. The contractor also stretched three strands of barbed wire on the west, north, short east and diagonal sides of the fence. All fencing fabric was stretched with the exception of an 8' section at the southeast corner of the site.

Week Three - April 16, 1984

The fence was completed at 1500 hours on April 16, 1984. On this day, Thomas Fence personnel stretched three strands of barbed wire on the east side of the site adjacent to Mill Street, installed the 3' filler panel at the southeast corner of the site, stretched the 8' section of fabric previously mentioned, installed a new drop bar in the main gate and all fence post caps and "No Trespassing" signs. Upon completion of the fence, Mr. Drew Thomas of Thomas Fence provided a total of five keys for the main gate lock.

The site was secured on April 16, 1984, at 1545 hours. The final cost of the removal action, excluding EPA and TAT costs, totaled $8,146.52.

1.4 State Efforts To Clean Up Site

The State of Ohio assisted the U.S. EPA in various aspects of the second immediate removal action at the Old Mill site. In particular, the OEPA inspected the site with Mr. Joseph Fredle on June 22, 1983, and assisted in the development of the sampling plan for the collection of soil samples. OEPA also provided valuable input at the RRT meeting held on January 31, 1984. It should be noted that the OEPA did not have funds readily available to contribute towards the construction of the fence at the Old Mill site. Those options discussed which would defray all or a portion of the cost of the fence to the State of Ohio (i.e., 1. construct the fence through the remedial program as an Initial Remedial Measure, and 2. request a special allocation from the Ohio Legislature) could not be impemented in the time frame considered necessary for the completion of the fence.

1.5 Summary of Expenditures

PEDOC Environmental, Inc., contracted Skidmore Excavating (Contract Number PEI-84-8445-1004) and Thomas Fence Company, Inc. (Contract Number PEI-84-8446-1004) for removal operations at the site. The contract with Skidmore Excavating provided for a bulldozer and operator for purposes of clearing a corridor for installation of the fence. The contract with Thomas Fence provided for all necessary personnel, equipment and materials for construction of the fence surrounding the Old Mill site.

Construction activities were initiatied on April 2, 1984, and were completed on April 16, 1984. Because the fence was bid on a per-foot rather than a time-and-materials basis, and

because subsistence costs did not apply, daily expenditures for services provided were not calculated. Total contractor expenditures for the construction of the fence are presented in Table 2.

In addition to the costs incurred through contractor services, recoverable costs were also expended by U.S. EPA and TAT personnel. Combined contractor, EPA and TAT costs incurred during the second immediate removal at the Old Mill site total $11,920.36 and are summarized in Table 3.

1.6 Community Relations

During the first immediate removal action at the Old Mill site, a group of concerned citizens formed consisting of a few members of the Village Council and some residents near the site. This group proved to be active during the planning stages of the second removal action as well. Although very concerned about the direct contact threat posed by the contaminated soils on the site, the local citizens had two main reservations about the construction of a fence. The first resulted from the citizens' perception that they would have more "leverage" in getting the site cleaned up (in particular having the contaminated soils removed) without a fence. The second reservation stemmed from the citizens' misinterpretation of a response option presented in the Old Mill site Remedial Action Master Plan (RAMP). The option creating the concern stated that the Old Mill site could be made into a "secure site." The citizens interpreted this to mean that the site could be used to accept hazardous waste for storage purposes (i.e., a facility permitted under the Resource Conservation and Recovery Act).

In response to these concerns, the OSC sent a letter to the Mayor of Rock Creek, Mr. John Robinson, dated March 23, 1984. The letter summarized on-going remedial efforts at the Old Mill site and assured the citizens that waste would not be transported to and stored on the fenced-in site. The letter appeared to clarify the U.S. EPA's commitment to protect public health as the fence was constructed without citizen opposition. On March 28, 1984, the Office of Public Affiars issued a Fact Sheet Update to reaffirm the OSC's letter.

1.7 Public Health

On January 31, 1984, a RRT meeting was held to address the conditions at the Old Mill site (refer also to Section 1.2 of this text). At the conclusion of the RRT meeting, all members agreed that the situation, as it existed, posed a serious and imminent threat to human health and the environment.

TABLE 2

SUMMARY OF CONTRACTOR EXPENDITURES
FOR CONSTRUCTION OF THE FENCE AT THE OLD MILL SITE

Contractor	Amount
PEDCO Environmental, Inc. Skidmore Excavating	$ 300.00
PEDCO Environmental, Inc. Thomas Fence Company, Inc.	7,609.24
Subtotal	$7,909.24
3% Handling Charge	237.28
Total	$8,146.52

TABLE 3

SUMMARY OF TOTAL CLEANUP COSTS
INCLUDING CONTRACTOR, EPA AND TAT EXPENDITURES

Organization	Amount
PEDCO Environmental, Inc.	$8,146.52
EPA personnel	700.00
EPA vehicle	161.00
Technical Assistance Team	2,842.84[1]
	Total $11,920.36

[1]Total costs through June 8, 1984.

Of greatest concern to the U.S. EPA, and local residents as well, was the unrestricted nature of the Old Mill site which posed a direct contact threat to area residents. The number of small children living near the site enhanced this concern. Reviews of soil data by the U.S. EPA-ERT and CDC stated that, due to elevated levels of lead and polynuclear aromatic hydrocarbons, access to the site should be restricted. The construction of the fence surrounding the site eliminated the direct contact threat posed by unrestricted access to contaminated soil.

2.0 EFFECTIVENESS OF REMOVAL ACTIONS

2.1 Responsible Parties

On February 22, 1984, an Administrative Order was sent to Mr. Jack Webb ([redacted]), former operator at the Old Mill site (Appendix B). Mr. Webb declined to take those corrective measures outlined in the order and thus, the U.S. EPA conducted a CERCLA-funded immediate removal action.

2.2 State and local Agencies

As noted in Section 1.4, state and local government agencies were incapable of undertaking any cleanup action.

2.3 Federal Agencies

The U.S. EPA was the lead agency during the immediate removal at the Old Mill site. The objective of this federal action was to restrict public access, in a timely manner, to the contaminated soils located on the site. This was accomplished through construction of a 6' fence which completely surrounded the site. Problems encountered were minimal and the 1022 foot long fence was constructed in eight working days.

In addition to the support received from EPA Emergency Response Team personnel, EPA Region V received assistance from other federal organizations, including:

- Department of Health and Human Services - Centers for Disease Control (CDC) - Representatives from the CDC provided an interpretation of the soil sample data. Their interpretation was invaluable in assessing the need for an immediate removal action at the site.

- U.S. Geological Survey (USGS) - Representatives from the USGS attended the RRT meeting and provided information on the geology of the Rock Creek area.

This information was used to evaluate the potential for ground water contamination from on-site contaminants.

2.4 Contractors

The Thomas Fence Company, Inc. (5515 Woodman Avenue, Ashtabula, Ohio 44004) was subcontracted to construct a fence around the Old Mill site in Rock Creek, Ohio. All contractor personnel performed efficiently and were cooperative. As previously mentioned, the 1022 foot fence was installed in eight working days. The fence is stable, all lines are installed straight and the fabric is always within three inches of the ground. The work performed by the contractor generally exceeded the standards originally established by the OSC.

3.0 PROBLEMS ENCOUNTERED

Aside from the public concern regarding the installation of the fence discussed in Section 1.6, no significant problems were encountered during the second immediate removal at the Old Mill site.

4.0 RECOMMENDATIONS

This OSC has no recommendations concerning the second immediate removal at the Old Mill site.

APPENDIX A

ACTION MEMORANDUM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: MAR 6 1984

SUBJECT: Immediate Removal Request for the Old Mill Site in Rock Creek, Ohio - ACTION MEMORANDUM

FROM: William H. Sanders III, Director
Environmental Service Division

TO: Valdas V. Adamkus
Regional Administrator

PURPOSE

Based on additional data received, the Regional Response Team (RRT) has recommended that a new immediate removal action be implemented at the Old Mill site. A fence is needed to keep people, especially the neighboring small children, off the site. This request for $12,000 is to cover the cost of such a project.

BACKGROUND

The village of Rock Creek is located in Ashtabula County in the northeastern corner of Ohio. The Old Mill site is located on the east side of the village. The site is bounded by Station Street on the north, Mechanic Street on the east, an abandoned section of Penn Central Railroad right-of-way on the west, and property owned by Rock Creek Aluminum Company on the south.

The area around the village of Rock Creek and the Old Mill site is rural. The two-acre site is approximately 100 feet from five houses located across Mechanic Street toward the east. There are small children living in these houses. A small grade school is about one-half mile from the site.

The Old Mill site is abandoned and includes four dilapidated wooden buildings and four concrete silos. Drainage flows toward the southwest corner of the site and enters a tributary to Rock Creek. The site is partially fenced and public access is only partially restricted. The site is on the National Priority List (NPL).

The Environmental Protection Agency (EPA) initiated emergency action at this site using the 311(k) fund of the Clean Water Act in November 1980 to perform an extent of contamination study. On November 6, 1981, $50,000 of CERCLA immediate removal funds were approved to remove all flammable liquids from the site. On October 1, 1982, an additional $110,000 was approved to remove all drummed material including PCBs from the site. These actions were completed by November 12, 1982.

In November 1982 and June 1983, EPA representatives collected soil samples at the facility to determine whether additional response action was necessary. The November 1982, surface soil samples were collected after the top 2 inches of contaminated soil were removed. The analytical results showed soil contamination remained in the areas where the drums were stored over the years. Some of the contaminants were: fluoranthene/pyrene - 5800 ppm, chrysene/benzo (A) anthracene - 2300 ppm, dimethylbenzene - 3475 ppm, ethylbenzene - 1420 ppm, etc. The June 1983 sample results disclose the presence at the facility of the following substances: elevated concentrations of polynuclear aromatic hydrocarbons and volatile priority pollutants (primarily, trichloroethylene, tetrachloroethylene, ethylbenzene and dimethylbenzene isomers). A high value of 8370 ppm lead was also reported.

THREAT

The substances described above are "hazardous substances" as defined at section 101(14) of CERCLA and are subject to the terms and provisions of the act. These substances have been released into the environment at the facility.

The OSC solicited opinions from the Centers for Disease Control (CDC) and EPA's Environmental Response Team (ERT) concerning the threat to public health and the environment from the on-site soil contamination. The ERT concluded that the remaining soil contamination presents a potential long term environmental problem that should be addressed as part of the ongoing remedial actions at this facility. The CDC concluded that the remaining contamination poses a significant potential health hazard to a specific segment of the public. They felt that by instituting a method of restricting access, the site would not be considered an imminent health hazard pending cleanup. The OSC presented the sampling data and the CDC/ERT recommendations to a meeting of the RRT on January 31, 1984. The RRT recommended that a fence be erected around the site as an immediate removal action because they felt the site posed an immediate and significant risk of harm to human health through exposure to acutely toxic substances.

Exposure to the hazardous substances described above may present an imminent and substantial endangerment to the public health and welfare. The population at risk includes animals and humans, especially children, who may inadvertently wander on the facility's premises and become exposed to the hazardous substances in the soil. Exposure to the hazardous substances may cause illness or other harmful effects to this population.

In order to protect human health and welfare it is necessary that action be taken to restrict access to the facility.

A remedial investigation is being performed with completion expected by July 1984. A feasibility study will then be conducted to determine the options for any remedial action at the site. This study should be completed by the end of 1984.

ENFORCEMENT

The Office of Regional Counsel is actively pursuing cost recovery litigation pursuant to the completed immediate removal actions taken at this site. On February 22, 1984, you issued an administrative order to Jack Webb, the site operator, to fence the site. He responded to the order by declining to take action on the grounds that he cannot afford to erect the fence.

CLEANUP OPTIONS CONSIDERED

Option A - Soil Removal

The contaminated soil could be removed to a depth of 1-2 feet in all areas where the drums were stored. This soil would be disposed of and clean clay brought in to cap the area. Cost estimate is $140,000. This option was rejected by the RRT because of the need to do a more detailed study of the extent of contamination before soil removal could be considered. As previously mentioned, a remedial investigation is in progress.

Option B - Fence Site

The site could be fenced for $10,000. This option was recommended by the RRT as an inexpensive way to keep people (especially small children) off the site until the extent of any further remedial action can be determined.

PROPOSED PROJECT

The OSC proposes to fence the site. The project could be started within two weeks of funding approval and should take no more than two weeks to complete. An exemption request from the six month time limit is not required because the previous removal action was completed in 1982. Any new removal action is considered a new project.

RECOMMENDATION

Based on the nature of the threat present at the Old Mill site, I recommend your approval of the proposed immediate removal action. The proposed action is expected to successfully abate the threat to the public health. My office will allocate the following costs:

Extramural (fence contractor)	-	$10,000
Intramural	-	1,000
TAT Costs	-	1,000
Total Project Ceiling	-	$12,000

T.V. Sanders

William H. Sanders III

Concur: Walter D. Adams Jr. Date: 3/07/84

Nonconcur: _____ Date: _____

APPENDIX B

RESPONSIBLE PARTY NOTIFICATION

Sandke

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

UNITED STATES ENVIRONMENTAL PROECTION AGENCY
REGION V

IN THE MATTER OF:	)	
	)	
Jack Webb, an Individual	)	ADMINISTRATIVE ORDER
	)	
Proceeding Under Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 [42 U.S.C. 9606(a)]	)	Docket No. V-W-84-C-002

PREAMBLE

The following Order is issued on this date to Jack Webb, [redacted] (Respondent), pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) [42 U.S.C. 9606(a)], by authority delegated to the undersigned by the Administrator of the United States Environmental Protection Agency (EPA). Notice of the issuance of this Order has heretofore been given to the State of Ohio.

There is an imminent and substantial endangerment to the public health and welfare due to a release of hazardous substances as defined in §101(14) of CERCLA from the following location (Facility):

PARCEL ONE:
Situated in the Village of Rock Creek, County of Ashtabula and State of Ohio and known, bounded and described as follows:

And known as a part of Original Morgan Township Lot No. 117 and bounded and described as follows: Beginning at an iron pin in the westerly line of the Public Highway known as Mechanic Street at the northeast corner of lands formerly owned by The Reick-McJunk in Dairy Company; thence north 89° 40' West along the northerly line of said land of said Dairy Company, 165.56 feet to the easterly line of lands of the P Y & A R R Co.; thence northerly along the easterly line of said land of said Railroad Company 171.61 feet to an iron pin; thence easterly 25.56 feet to an iron pin; thence northerly 7.00 feet to an iron pin; thence easterly 140.00 feet to an iron pin in the westerly line of Mechanic Street; thence southly, along the westerly line of Mechanic Street, 179.58 feet to the place of beginning, containing 0.795 of an acre of land, be the same more or less, but subject to all legal highways.

PARCEL TWO:
Situated in the Township of Morgan, County of Ashtabula and State of Ohio: And known as being part of Lot No. 117 in said township and bounded and described as follows: Beginning at an iron pin at the intersection of the center line of Mechanic Street with the center line of Grove Street; thence southerly along the center line of Mechanic Street three hundred (300) feet to a point; thence westerly at right angles to last described line thirty (30) feet to an iron pin; thence in the same course one hundred and forty (140) feet to an iron pin; thence southerly at right angles with the last described line seven (7) feet to an iron pin; thence westerly at right angles with the last described line twenty-four and fifty one-hundredths (24.50) feet to an iron pin; thence in the same course one and thirty-six hundredths (1.36) feet to the east right of way line of the P. Y. and A. R. R.,; thence northerly along the east right of way of said Railroad three hundred sixteen and seventy-nine one hundredths (316.79) feet to the center of Grove Street; thence easterly along the center of Grove Street one hundred ninety-five and eighty-one hundredths (195.80) feet to the place of beginning, and containing one and thirty-seven hundredths (1.37) acres of land.

This Order directs you to undertake action to protect the public from this endangerment.

FINDINGS AND CONCLUSIONS

1. Respondent was, during an unspecified time prior to and after August 1977, the operator of Western Nurseries Company, a reclaimer/recycler of organic waste materials at the Facility. During July and August 1977, hazardous substances, including those described herein, were transported to, stored and disposed of at the Facility. Subsequent to August 1977 Respondent vacated the Facility.

2. The Facility is a two acre rectangular shaped property located in Rock Creek, Ashtabula County, Ohio. The property consists of several vacated and dilapidated buildings and storage silos. The Facility is partially fenced and is abutted by two streets, a commercial property and railroad right-of-way. The Facility is in close proximity to a residential area.

3. On June 20, 1979, the facility was inspected by Joseph Fredle, a duly authorized representative of EPA. At the time of his inspection, Mr. Fredle observed the following conditions: approximately 500 drums of liquid and semi-liquid material in various stages of deterioration (bulging, rusting and leaking). The drums were located in and around an unused storage building. Mr. Fredle spoke with Respondent and determined that the drums contained hazardous substances including, but not limited to, toluene, paint thinners, solvents and formaldehyde. Fumes from the drums and spills were noted. The fumes gave Mr. Fredle a sore throat and headache.

4. In February 1980, Mr. Fredle re-inspected the Facility and determined that additional drums of waste chemicals had been moved to the facility thereby increasing the drum census to approximately 1200. Most of these additional drums were marked toxic, flammable-toxic, flammable and hazardous. Some of the drums were marked perclene, polymeg, 1,1,1 trichloroethane, methylene chloride, bakelite phenolic plastic, tuluol, isopropanol and acetone.

5. In May 1980, EPA and OEPA representatives collected soil, drum and water samples at the Facility. The drum samples showed that the contents were ignitable. A soil sample contained 7 parts per million polychlorinated biphenyls. Based upon this information and the results of additional sampling EPA undertook response action pursuant to section 311 of the Clean Water Act, 33 U.S.C. 1321, and section 104(a) of CERCLA to remove the drummed waste and contaminated soil from the Facility.

6. On June 29-30, and July 1, 1983, EPA representatives collected additional soil samples at the Facility to determine whether further response action was necessary. The sample results disclose the presence at the Facility of the following substances: elevated concentrations of polynuclear aromatic hydrocarbons and volatile priority pollutants (primarily, trichloroethylene, tetrachloroethylene, ethylbenzene and dimethylbenzene isomers). A high value of 8,000 parts per million lead was also reported.

These substances are "hazardous substances" as defined at section 101(14) of CERCLA and are subject to the terms and provisions of that Act. These substances have been released into the environment at the Facility.

7. Exposure to the hazardous substances described above may present an imminent and substantial endangerment to the public health and welfare. The population at risk includes animals and humans, especially children, who may inadvertently wander on the Facility's premises and become exposed to the hazardous substances in the soil. Exposure to the hazardous substances may cause illness or other harmful effects to this population.

In order to protect human health and welfare it is necessary that action be taken to restrict access to the Facility.

ORDER

Based upon the foregoing determinations and Findings and Conclusions, it is hereby Ordered:

1. Respondent shall, within 10 days of receipt of this Order develop and submit to EPA a plan to restrict access at the facility. The plan shall include, but is not limited to, the construction of a chain link fence, with locking gate, on the perimeter of the facility. The fence shall be located in accordance with the location denoted on the attached site sketch. (Attachment A). The fence shall be a least six feet high with an additional two feet of barb wire strands to further restrict access.

2. Respondent shall implement the plan within seven days of approval by EPA. In no event shall Respondent begin construction of the fence described above until the specifications for the fence have been approved by EPA. Respondent shall complete construction of the fence within 21 days of EPA's approval of its specifications.

3. EPA reserves its right to issue additional orders to effect response action at the Facility subsequent to the effective date of this Order.

4. Nothing contained in this Order shall affect any right, claim or cause of action that any party hereto has against parties not subject to this Order.

5. Nothing contained in this Order shall be construed to preclude EPA from seeking legal or equitable relief to enforce the terms of this Order, require additional action by Respondent to mitigate the hazards at the facility or preclude EPA from taking any additional action pursuant to the provisions of CERCLA, 42 U.S.C. 9601 et seq.

6. All correspondence submitted by Respondent to EPA shall be sent by certified mail, return receipt requested, to:

Pierre Talbert
Assistant Regional Counsel
United States Environmental
Protection Agency (5C-16)
230 South Dearborn Street
Chicago, Illinois 60604

7. This Order is effective upon its issuance.

OPPORTUNITY TO CONFER

You may, within three calendar days after receipt of this Order, orally request a conference with representatives of EPA to discuss this Order and its applicability to you. At any conference held pursuant to your request, you may appear in person and by attorney or other representatives for the purpose of presenting any objections, defenses or contentions which you may have regarding this Order. If you desire such a conference, please contact Pierre Talbert, Assistant Regional Counsel, at (312) 886-6839 within the time set forth above.

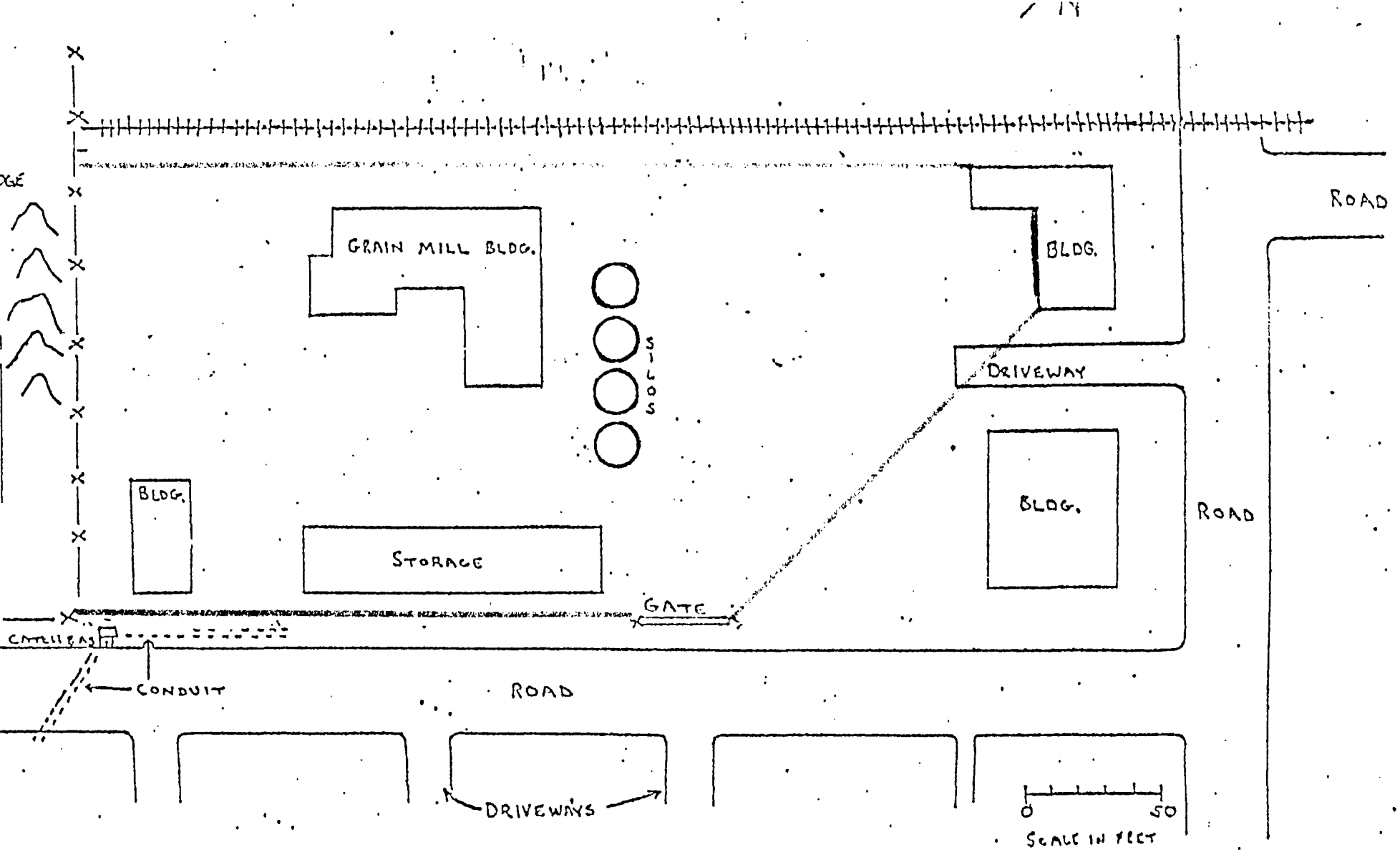
PENALTIES FOR NON-COMPLIANCE

You are advised that willful violation or failure or refusal to comply with this Order, or any portion thereof, may subject you, by the provisions of section 106(b) of CERCLA [42 U.S.C. 9606(b)], to a civil penalty of not more than $5,000 for each day in which such violation occurs or such failure to comply continues. Failure to comply with this Order, or any portion thereof, without sufficient cause, may subject you, by the provisions of section 107(c)(3) of CERCLA [42 U.S.C. 9607(c)(3)], to liability for punitive damages in an amount up to three times the amount of any costs incurred by the government as a result of your failure to take proper action.

Witness my hand in the City of Chicago, State of Illinois, as Regional Administrator, on this 22 day of FEB, 1984.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY

BY: Valdas V. Adamkus



OLD MILL SITE, ROCK CREEK, OHIO

FENCE ALLEGED

APPENDIX C

DELIVERY ORDER

DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2.)

1. DATE OF ORDER March 13 1984	2. CONTRACT NUMBER 68-01-6894	3. ORDER NUMBER 6894-05-0004

4. TIME OF INITIAL ORDER *(If initial order was verbal) (Specify Time Zone)*
410 Cent. ☐ AM ☒ PM

5. DELIVERY ORDER CEILING AMOUNT *(Obligated Amount)*
10,000 $9600 + 1374

6. ACCOUNTING AND APPROPRIATION DATA

Appropriation Number	Document Control No.	Account Number	Object Class
6820X8145	D2H028	4TTA725E25	25.35

7a. ISSUED TO: CONTRACTOR *(Name, Address, and ZIP Code)*
PEDCO ENVIRONMENTAL INC
11499 CHESTER RD
CINCINNATI, OHIO 45246

8a. ISSUED BY: ORDERING OFFICE *(Name, Address, and ZIP Code)*
USEPA, REG V
Spill Resp Section
536 S. Clark St
Chicago, IL 60605

7b. PROGRAM MANAGER *(Name and Phone Number)*
Mr Richard Gerstle

8b. EPA REGION/USCG DISTRICT
5

8c. ZONE
II

7c. RESPONSE MANAGER *(Name and Phone Number)*

8d. ON-SCENE COORDINATOR *(Name and Phone Number)*
Joseph Fredle

9. RESPONSE LOCATION *(Site Name and/or Address and ZIP Code)*
Old Mill
Rock Creek, Ohio

10. CONTRACTOR REQUIRED ON SITE *(Date and Time) (Specify Time Zone)*
April 2, 1984 ~~March 19 1984~~ ☒ AM ☐ PM

11. REQUIRED WORK COMPLETION DATE
~~1 days~~ April 13, 1984

12. STATEMENT OF WORK

The Contractor shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work set forth below:

THE CONTRACTOR SHALL CONSTRUCT A CHAIN LINK FENCE ON THE SITE AS DIRECTED BY THE OSC.

* WORK WILL START ON MARCH 19 1984 IF SNOW HAS MELTED SUFFICIENTLY. IF NOT THE OSC WILL ADVISE THE CONTRACTOR.

Work scheduled April 2-13 by J Fredle

13. ORDERING OFFICER

NAME/TITLE	SIGNATURE	DATE
Bowden, Robert J. Chief SRS	Robert J Bowden	3/14/84

EPA Form 1900-59 (11-83) ☆ U.S. GPO 1983—426-222/364

ORDERING OFFICER/OSC

APPENDIX D

TDD FOR TAT

TECHNICAL DIRECTION DOCUMENT (TDD)
OHM EMERGENCY RESPONSE AND SPILL PREVENTION PROGRAM

ROY F. WESTON, INC. 1259

1. COST CENTER: 5

2. NO.: 5-8403-4
2A. TYPE: 3

3. PRIORITY:
- ☒ HIGH (1)
- ☐ MEDIUM (2)
- ☐ LOW (3)

4. SOURCE OF FUNDS:
- ☒ CERCLA (1)
- ☐ 311 (2)
- ☐ OTHER (3) _____

5. EPA SITE ID (IF APPLICABLE): _____
5A. EPA SITE NAME (IF APPLICABLE): _____

6. COMPLETION DATE: 15 Mar 84
7. OVERTIME APPROVED:
- ☒ YES ☐ NO

8. REFERENCE INFO:
- ☐ YES ☒ NO
- ☐ ATTACHED
- ☐ PICK UP

9. GENERAL TASK DESCRIPTION: TAT to assist OSC Fredle in overseeing construction of a fence at Old Mill.

9A. SPECIAL PROJECT - ESTIMATED COST: _____ ESTIMATED HOURS: _____

10. SPECIFIC ELEMENTS: TAT will maintain site CERCLA paper work, monitor contractor activity and prepare OSC report upon completion of the action

11. INTERIM DEADLINES:

12. DESIRED REPORT FORM: FORMAL REPORT ☒ LETTER REPORT ☐ FORMAL BRIEFING ☐

OTHER (SPECIFY): _____

13. COMMENTS: _____

14. AUTHORIZING DPO: R. J. Brodler
(SIGNATURE)

15. DATE: 3/20/84

16. RECEIVED BY: ☒ ACCEPTED ☐ ACCEPTED WITH EXCEPTIONS ☐ REJECTED
(TATL SIGNATURE)

17. DATE: 23 Mar 84

18. DESCRIPTOR 05 84 03 04 X 1 03 OLD MILL FENCE OH I X

Sheet 1 White — TATL Copy
Sheet 2 Green — DPO Copy (Signed by TATL, Replaces Original)
Sheet 3 Canary — NPMO Copy
Sheet 4 Pink — Project Officer Copy

APPENDIX E

POLREPS

WPCLMB

WPCCLE WLKE
DATE: APRIL 4, 1984

FROM: JOE FREDLE, OSC, USEPA, REGION V, WESTLAKE, OH
(810-427-9255)

TO: HENRY VAN CLEAVE, EMERGENCY RESPONSE (710-822-9269)
ROBERT BOWDEN, SRS (910-221-5191)
DEBBIE BERG/GARY GIFFORD, OEPA, TWINSBURG, OH
PIERRE TALBERT, 5C
MARY TYSON, 5HR
VANESSA MUSGRAVE, 5PA

SUBJECT: IMMEDIATE REMOVAL ACTION - FENCING OF OLD MILL SITE, ~~JEFFERSON~~, OHIO
Plat Corr

POLREP: ONE

1. SITUATION:

A. 1/31/84 - THE RRT RECOMMENDED THAT THE OSC PROCEED WITH AN IMMEDIATE REMOVAL ACTION TO FENCE THE SITE. THE MAIN REASON FOR THE FENCING IS THE HIGH LEAD LEVEL FOUND ON SITE (8300 PPM).

B. 2/24/84 - AN ADMINISTRATIVE ORDER WAS ISSUED TO JACK WEBB TO REQUIRE HIM TO FENCE THE SITE. A NEGATIVE RESPONSE WAS RECEIVED.

C. 3/7/84 - THE RA SIGNED THE IMMEDIATE REMOVAL REQUEST-ACTION MEMORANDUM AUTHORIZING $12,000 TO ERECT A FENCE AT THIS SITE.

D. LOCAL CITIZENS AND OFFICIALS CONCERNED ABOUT THE FENCED-IN SITE BEING USED AS A STORAGE SITE FOR HAZARDOUS WASTE. THEY WERE ALSO CONCERNED ABOUT LOOSING LEVERAGE TO GET THE SITE COMPLETELY CLEANED UP UNDER THE REMEDIAL PROGRAM.

2. ACTIONS TAKEN:

A. ERCS CONTRACTOR TASKED TO GET BIDS FROM SUB-CONTRACTORS FOR THE FENCE JOB. THOMAS FENCE COMPANY (ASHTABULA) HAD THE LOWEST BID.

B. 3/23/84 - OSC SENT THE MAYOR A LETTER IN AN ATTEMPT TO ALLEVIATE THE CONCERNS ABOUT THE FENCING.

C. 3/28/84 - SUPERFUND COMMUNITY RELATIONS COORDINATOR ISSUED A FACT SHEET UPDATE TO LOCAL RESIDENTS.

D. 4/2/84 - FENCE LINE IS CLEARED BY CONTRACTOR.

E. 4/3/84 - POST HOLES DUG FOR FENCE.

3. FUTURE PLANS:

   A. 4/4/84 - POST BEING CEMENTED INTO GROUND.

   B. 4/9/84 - FENCE FABRIC WILL BE INSTALLED.

4. CURRENT PROJECT COSTS:

   A. $300.00

5. RECOMMENDATIONS:

   A. NONE.

6. STATUS:

   A. CASE OPEN.

ENDIT

MPCLMB

WPCLMB

WPCCLE WLKE
DATE: APRIL 20, 1984

FROM: JOE FREDLE, OSC, USEPA, REGION V, WESTLAKE, OH
(810) 427-9255

TO: HENRY VAN CLEAVE, EMERGENCY RESPONSE (710-822-9269)
ROBERT BOWDEN, SRS (910-221-5191)
DEBBIE BERG/GARY GIFFORD, OEPA, TWINSBURG, OH
PIERRE TALBERT, 5C
MARY TYSON, 5HR
VANESSA MUSGRAVE, 5PA

SUBJECT: IMMEDIATE REMOVAL ACTION - FENCING OF OLD MILL SITE, ROCK CREEK, OHIO

POLREP: TWO & FINAL

1. SITUATION:

IMMEDIATE REMOVAL ACTION IS FINISHED.

2. ACTIONS TAKEN:

4/16/84 - FENCE FULLY ERECTED.

3. FUTURE PLANS:

OSC REPORT TO FOLLOW.

4. CURRENT PROJECT COSTS:

$8,000.

5. RECOMMENDATIONS:

NONE.

6. STATUS:

CASE CLOSED

ENDIT

WPCLMB

APPENDIX F

CERCLA CLEANUP FORMS

1. Daily Summaries

DAILY SUMMARY CERCLA CLEANUP

Date: 4/2/84	Time Commenced Work: 1020	Time Completed Work: 1400

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Skidmore Excavating

Type of Personnel: 1 operator, 1 foreman

Equipment Utilized: 1 - TD 7 International Bulldozer

Scope of Work Completed:

Cleared and leveled corridor for construction of fence.

Work completed without incident.

Comments:

Future Plans:

On 4-3 Thomas Fencing personnel will lay out fenceline and drill post holes.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/3/84 | Time Commenced Work: 0915 | Time Completed Work: 1535

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers; 1 foreman

Equipment Utilized: Backhoe with auger

Posthole diggers

Scope of Work Completed:

Contractor bored all fence post holes (102) and initially set 36 line posts.

Comments:

Future Plans:

On 4-4, Thomas Fencing personnel will (weather permitting) finish excavating fence post holes where rock was incurred, initially set the remainder of the fence posts and begin to set posts in concrete.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/4/84	Time Commenced Work: 1000	Time Completed Work: 1430

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers

Equipment Utilized: Backhoe with auger

Posthole digger

Scope of Work Completed:

Contractor continued to excavate fence post holes where rock was incurred and initially set the remainder of the fence posts.

Comments:

Future Plans:

On 4-5, Thomas personnel will (weather permitting) set all fence posts in concrete.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/5/84	Time Commenced Work: 0900	Time Completed Work: 1545

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

French's, Inc.

Type of Personnel: 4 laborers

1 truck driver

Equipment Utilized: Honda ATV tricycle w/cart

Posthole digger

Scope of Work Completed:

Contractor set a total of 94 line posts and 8 cornerposts in concrete.

Comments:

Posts will be allowed to set for 3 days (4-6/4-9) before fabric is hung. This will ensure that concrete is set before tension is put on posts.

Future Plans:

On 4-9, contractor will install top rail and corner braces.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/10/84	Time Commenced Work: 1000	Time Completed Work: 1600

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers

Equipment Utilized:

Come-Along
Hand Tools

Scope of Work Completed:

Contractor installed all toprail. Also installed all corner braces with the exception of those on eastern most section. Three sections of fence were stretched: northern, short eastern and diagonal.

Comments:

Future Plans:

On 4-11, contractor will stretch remainder of fabric.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/11/84 | Time Commenced Work: 0900 | Time Completed Work: 1330

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers

Equipment Utilized:

Come-Along

Hand Tools

Scope of Work Completed:

Contractor stretched fabric on western and eastern-most sections of fence.

Comments:

Future Plans:

On 4-13, contractor will complete installation of fence.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/13/84 | Time Commenced Work: 1020 | Time Completed Work: 1630

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers

Equipment Utilized:

Come-Along

Hand Tools

Scope of Work Completed:

Contractor installed all fence ties (~1200) and stretched 3 strands of barbed wire along west and north sides of site. Contractor also installed main gate and corrected height of cornerpost @ SW corner.

Comments:

Contractor did not complete all work on fence today as tentatively agreed upon.

Future Plans:

On 4-16, contractor will stretch the remainder of the barbed wire, install the panel at SE corner of site, and make final adjustments to fence.

DAILY SUMMARY CERCLA CLEANUP

Date: 4/16/84 | Time Commenced Work: 1010 | Time Completed Work: 1500

Facility: Old Mill Site - Rock Creek, Ohio

Contractor(s): Thomas Fencing, Inc.

Type of Personnel: 2 laborers

Equipment Utilized:

Come-Along

Hand Tools

Scope of Work Completed:

Contractor stretched 3 strands of barbed wire on east side of site, installed panel SE corner of site, stretched 8' section of fabric at SE corner of site, installed new drop bar in main gate, installed fence post caps and "No Trespassing" signs and made final adjustments to fence.

Comments:

Fence is completed, without incident. Thomas Fence gave TAT a total of 5 keys to the lock on the gate.

Future Plans:

None

2. Personnel Entry and Exit Log

PERSONNEL ENTRY AND EXIT LOG

Work Site: Old Mill - Rock Creek
Date: April 2, 1984

Time		Name	Representing
In	Out		
1000	1045	Glen Thomas	Thomas Fencing
1000	1430	Tim Skidmore	Skidmore Excavating
1020	1400	Joe Fredle	U.S. EPA
1020	1400	Scott Springer	TAT - Weston
1300	1415	Glen Thomas	Thomas Fencing

PERSONNEL ENTRY AND EXIT LOG

Work Site: Old Mill-Rock Creek
Date: April 3, 1984

Time		Name	Representing
In	Out		
0915	1040	Glen Thomas	Thomas Fencing
0915	1535	Drew Thomas	Thomas Fencing
0915	1535	Gary Scott	Thomas Fencing
1010	1200	Scott Springer	TAT - Weston
1230	1550	Scott Springer	TAT - Weston

PERSONNEL ENTRY AND EXIT LOG			Work Site: Old Mill-Rock Creek Date: April 4, 1984
Time		Name	Representing
In	Out		
1000	1430	Drew Thomas	Thomas Fencing
1000	1430	Paul Dibennedetto	Thomas Fencing
1015	1440	Scott Springer	TAT - Weston

PERSONNEL ENTRY AND EXIT LOG

Work Site: Old Mill-Rock Creek
Date: April 5, 1984

Time		Name	Representing
In	Out		
0900	1550	Drew Thomas	Thomas Fencing
0900	1550	Gary Scott	Thomas Fencing
0900	1550	Dan Kuehn	Thomas Fencing
1010	1355	Floyd Bowditch	French's, Inc.
1200	1550	Paul Dibennedetto	Thomas Fencing
1205	1600	Scott Springer	TAT - Weston

PERSONNEL ENTRY AND EXIT LOG			Work Site: Old Mill-Rock Creek Date: April 10, 1984
Time		Name	Representing
In	Out		
1000	1600	Drew Thomas	Thomas Fencing
1000	1600	Paul Dibennedetto	Thomas Fencing

PERSONNEL ENTRY AND EXIT LOG

Work Site: Old Mill-Rock Creek
Date: April 11, 1984

Time In	Time Out	Name	Representing
0900	1330	Drew Thomas	Thomas Fencing
0900	1330	Paul Dibennedetto	Thomas Fencing

PERSONNEL ENTRY AND EXIT LOG			Work Site: Old Mill-Rock Creek Date: April 13, 1984
Time		Name	Representing
In	Out		
1000	1010	Scott Springer	TAT - Weston
1020	1630	Drew Thomas	Thomas Fencing
1020	1630	Paul Dibennedetto	Thomas Fencing
1045	1640	Scott Springer	TAT - Weston

PERSONNEL ENTRY AND EXIT LOG			Work Site: Old Mill-Rock Creek Date: April 16, 1984
Time		Name	Representing
In	Out		
1010	1500	Drew Thomas	Thomas Fence Co.
1010	1500	Paul Dibennedetto	Thomas Fence Co.
1020	1545	Scott Springer	TAT - Weston

3. Equipment and Materials Entry Log

EQUIPMENT AND EXPENDABLE MATERIALS ENTRY LOG

Work Site: Old Mill-Rock Creek
Site Spill No.: _____

Date	Time	Equipment or Materials Entering Site	Quantity
4/2	1000	TD-7 International Dozer	1
4/3	0915	Ford 600 Flatbed truck	1
	0915	Twin axle trailer for backhoe	1
	0915	Chevrolet 30 dumptruck	1
	0915	Backhoe w/auger	1
	0915	Pickup truck	1
4/4	1000	Ford 600 Flatbed truck	1
	1000	Twin axle trailer for backhoe	1
	1000	Chevrolet 30 dumptruck	1
	1000	Backhoe w/auger	1
4/5	0900	Chevrolet 30 dumptruck	1
	0900	Pickup truck	1
	0900	Honda ATV tricycle w/cart	1
	1010	Cement truck	1
4/10	1000	Ford 600 Flatbed truck	1
	1000	Chevrolet 30 dumptruck	1
4/11	0900	Ford 600 Flatbed truck	1
	0900	Chevrolet 30 dumptruck	1

EQUIPMENT AND EXPENDABLE MATERIALS ENTRY LOG

Work Site: Old Mill-Rock Creek
Site Spill No.: _____

Date	Time	Equipment or Materials Entering Site	Quantity
4/13	1020	Chevrolet 30 dumptruck	1
4/16	1010	Chevrolet 30 dumptruck	1

APPENDIX G

1900-55 FORMS

Form Approved
OMB Approval No. 20( )85
Expiration Date: 6-30-8

US ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS SUBSTANCE RESPONSE FUND
CONTRACTOR COST REPORT

CONTRACTOR	CONTRACT NUMBER
PEDCo Environmental	68-01-6894
CONTRACTOR PERSONNEL REPORT	ASSIGNMENT NUMBER: 6894-05-0004
	DATE: April 24, 1984

1. EMPLOYEES ASSIGNED	2. WORK CLASSIFICATION	3. HOURLY LABOR RATE		4. HOURS EMPLOYED		5.	6. TOTAL HOURS		7. TRAVEL AND SUBSISTENCE COSTS	8. TOTAL PERSONNEL COSTS
		REGULAR	OVERTIME	FROM	TO	BREAK TIME	REGU-LAR	OVER-TIME		
									TOTAL PERSONNEL COSTS	— 0 —

EPA Form 1900-55 (1-82)

Original — On-Scene Coordinator
Copy 1 — Contractor
Copy 2 — Procurement

CONTRACTOR–OWNED EQUIPMENT/MATERIALS REPORT

CONTRACTOR	CONTRACT NUMBER
PEDCo Environmental	68-01-6894
ASSIGNMENT NUMBER	**DATE**
6894-05-0004	April 24, 1984

9. EQUIPMENT USED	10. HOURS USED FROM	10. HOURS USED TO	11. COST PER HOUR	12. TOTAL HOURS	13. TOTAL COST	15. MATERIALS USED	16. QUANTITY	17. TOTAL COST
14. TOTAL EQUIPMENT COSTS				$ — 0 —		18. TOTAL MATERIAL COSTS		$ — 0 —

EPA Form 1900-55 (1-82)

Original — On-Scene Coordinator
Copy 1 — Contractor
Copy 2 — Procurement

SUBCONTRACTOR REPORT

CONTRACTOR	CONTRACT NUMBER
PEDCo Environmental	68-01-6894
ASSIGNMENT NUMBER	**DATE**
6894-05-0004	April 24, 1984

19. SUBCONTRACTOR NAME	20. WORK DESCRIPTION	21. SUBCONTRACT AMOUNT
Thomas Fence Co	Installation of 1022' of Chain Link Fence	7609.24
Skidmore Excavating	Clear Brush for Fence Installation	300.00
		7909.24
	HANDLING CHARGE (3%)	237.28
22. TOTAL SUBCONTRACT COSTS		$8146.52

23. REMARKS

$8146.52

24. CONTRACT CEILING AMOUNT	$10,000.00
25. TOTAL ESTIMATED CONTRACT COSTS TO DATE	$ 8146.52
26. TOTAL ESTIMATED COSTS TO COMPLETE CONTRACT	$ 1853.48

I certify that this report is a true and complete record of the labor, supervision, travel, equipment, materials, and subcontractors which I ordered and authorized from the contractor in the performance of the above-cited contract.

Signature of OSC Representative	Time Arrived on Scene	Time Departed
Joseph J Tvedt		

I certify that this report is a true and complete record of the labor, supervision, travel, equipment, materials, and subcontractors provided by the contractor in the performance of the above-cited contract.

Signature of Contractor's Authorized Representative	Date
Michael C Hessling	4/24/84

EPA Form 1900-55 (1-82)

Original — On-Scene Coordinator
Copy 1 — Contractor
Copy 2 — Procurement

№ 1414

SKIDMORE EXCAVATING
1751 Route 307 East
JEFFERSON, OHIO 44047

Phone 576-9288

JOB PHONE	DATE OF ORDER
	4-2-84
JOB NAME/LOCATION	
✓	

TO Federal Environmental Inc.
11499 Chester Rd. P.O. Box 46100
Cincinnati, Ohio 45246-0100

PHONE

ORDER TAKEN BY

TERMS:

DESCRIPTION	AMOUNT
4-2-84 Old Mill Site - Rock Creek, Ohio	
P.O. # PEI-84-8445-1004	
Bulldozer - 1 Day Clear brush	
for fence installation	$ 300.00

REC'D DBP
OK FOR PAYMENT
(PER)
CHG 1004
PN
BKP
A/C # 4116

LABOR	HOURS	RATE	AMOUNT

TOTAL MATERIAL
TOTAL LABOR 4-9-84
TAX $
PAY THIS AMOUNT → $ 300.00

WORK ORDERED BY	DATE COMPLETED	TOTAL LABOR

Thank You

SIGNATURE (I hereby acknowledge the satisfactory completion of the above described work.)

THOMAS FENCE CO. INC.

Ashtabula County (216) 998-4747
Lake County (216) 942-8548

5515 WOODMAN AVENUE ASHTABULA, OHIO 44004

CUSTOMER ORDER NO.	DATE COMPLETED	BILLING
PEI-84-8446-1004	Apr. 16,1984	

Pedco environmental, Inc.
Old Mill Site/Rock Creek, Ohio

Installation of 1,002' chain link fence. - $7,474.64
20 extra ft. @ 6.73 $ 134.60
$7,609.24

REC'D P&D
OK FOR PAYMENT
(PER) M-W
CHG PN 1004
BKP A/C # 411-R

Thank You.

4-18-84

PAYMENT EXPECTED WITHIN 10 DAYS, OTHERWISE 1½% PER MONTH WILL BE ADDED TO BALANCE

APPENDIX H

CLEANUP CONTRACTOR INVOICES CERTIFIED BY OSC

PEDCo ENVIRONMENTAL

11499 CHESTER ROAD CINCINNATI, OHIO 45246

SOLD TO: U.S. ENVIRONMENTAL PROTECTION AGENCY

DATE 4/29/84
INVOICE NO. 1004-1
OUR ORDER NO. PN-1004
CUST ORDER NO. 68-01-6894
D.O. #6894-05-0004

ATTENTION:

TERMS: NET CASH UPON PRESENTATION OF INVOICE

OLD MILL/ROCK CREEK PERFORMANCE PERIOD 4/24/84

CATEGORY	CURRENT	CUMULATIVE
Labor	$ 0	$ 0
Travel & Subsistence	0	0
Equipment Usage	0	0
Materials	0	0
Transportation	0	0
Disposal	0	0
Sampling/Analysis	0	0
Subcontract Services	0	0
Other	8,146.52	8,146.52
TOTAL INVOICE	$8,146.52	$8,146.52

CERTIFICATION: I CERTIFY THAT THIS INVOICE IS CORRECT AND IN ACCORDANCE WITH TERMS OF THE CONTRACT AND THAT THE COSTS INCLUDED HEREIN HAVE BEEN INCURRED, REPRESENT PAYMENTS MADE BY THE CONTRACTOR, AND PROPERLY REFLECT THE WORK PERFORMED.

J. Kevin Fox
Signature

Controller
Title

INVOICE

CERTIFICATION

I CERTIFY TO THE BEST OF MY KNOWLEDGE AND BELIEF THAT THE SERVICES SHOWN ON THE INVOICE HAVE BEEN PERFORMED AND ARE ACCEPTED.

5/21/84
Date

Signature

cc Coulter
RTP 5/22

APPENDIX I

TAT COSTS

TECHNICAL ASSISTANCE TEAM COSTS

Item	Amount ($)
Personnel Costs	2814.84
Travel Costs	28.00
TOTAL	2842.84[1]

[1]Total costs through June 8, 1984.

APPENDIX J

PHOTOGRAPHS

1,2. Skidmore Excavating clearing corridor for fence on western side of the site.

3,4. Skidmore Excavating clearing corridor for fence on the eastern sides of the site.

5,6. Thomas Fence personnel drilling post holes with mechanical auger.

7,8. Line posts initially set on the north and west and on the east sides of the site, respectively.

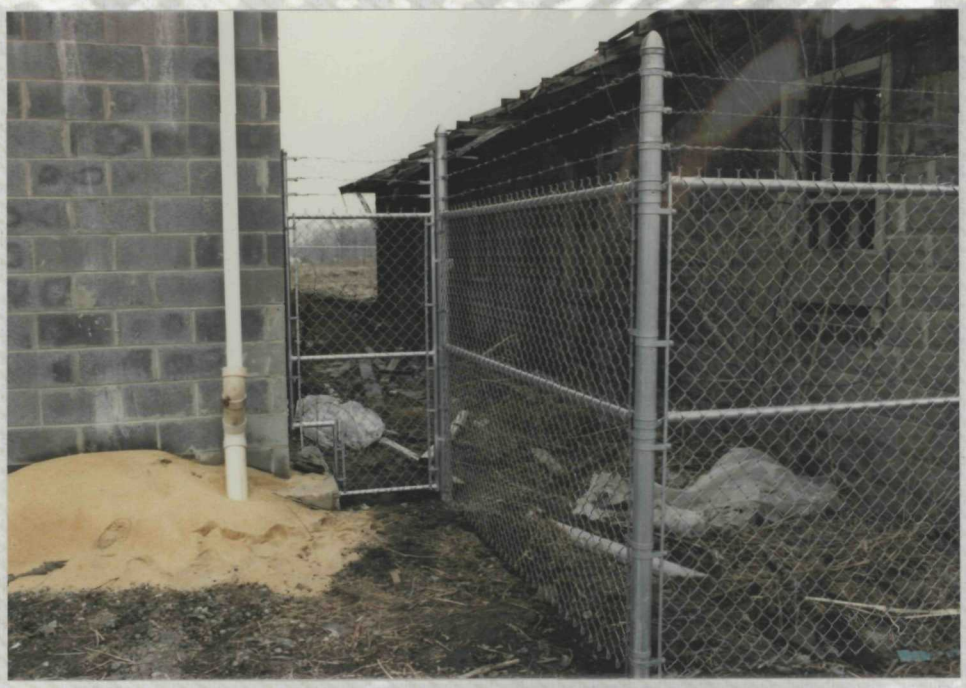
9,10. Line and corner parts being set in cement.

11. Thomas Fence personnel siting for proper placement of posts.

12. Cement truck on west side of site. Note use of ATV tricycle and cart to haul cement to each post hole.

13. Thomas Fence personnel making final adjustments to placement of fence posts.

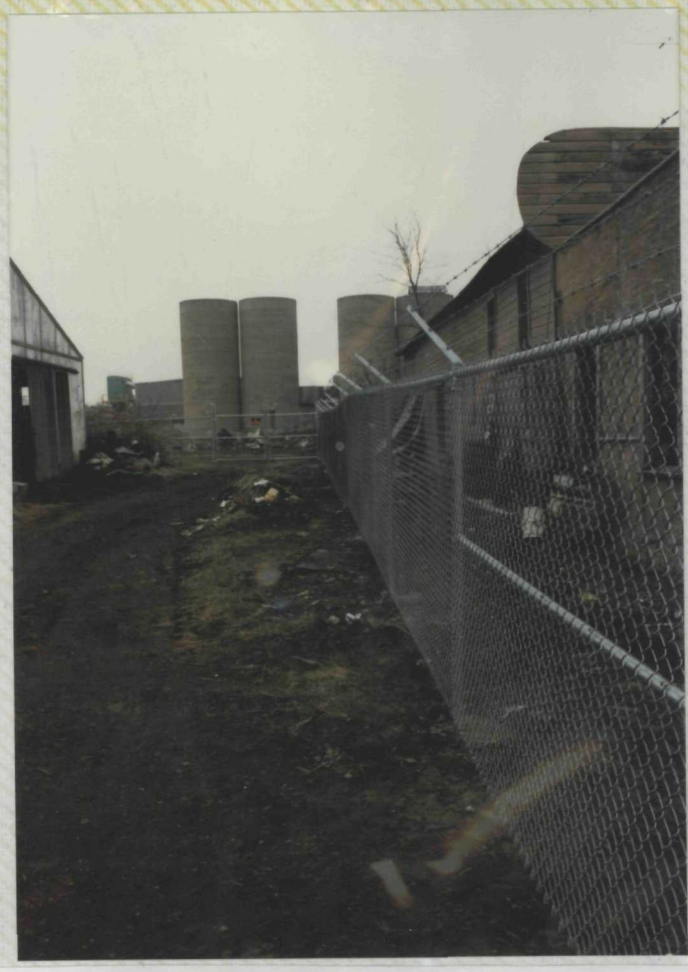
14. Thomas Fence personnel stretching barbed wire on western section of fence.



15. Southeast corner of fence. Note 3 foot filler panel from fence to building.

16. View of eastern fence line adjacent to Mill Street.

17,18. View of diagonal fence line and 12 foot main gate, respectively.



19. View of eastern fence line adjacent to abandoned lumber supply building.

20. View of northern fence line.

21,22. View of western fence line.

23. View of union of western fence line and existing fence belonging to the Rock Creek Aluminum Company.

APPENDIX K

SUMMARY OF SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

WESTON • SPER
Suite 1501, Northbrook Office Court
666 West Dundee Road, Northbrook, IL 60062 • (312) 498-9094

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

Mr. Joseph Fredle
On-Scene Coordinator
U.S. EPA, Region V
Eastern District Office
25089 Center Ridge Road
Westlake, OH 44145

February 14, 1984

TAT-05-F-00267

Reference: TDD# 5-8306-13
Old Mill Site Sample Collection and Analytical Efforts

Dear Mr. Fredle:

This letter report is in response to your request for a summary of the sampling activities and subsequent sample analyses performed after the completion of immediate removal operations at the Old Mill Site in Rock Creek, Ohio.

Some of the information contained within was presented to you in a letter report dated October 18, 1983. This was done to provide you with a single document summarizing all phases of the sample collection, sample analysis and data interpretation efforts.

Sample Collection

Prior to actual sample collection, a sampling plan had to be developed to accurately assess the extent and magnitude of soil contamination resulting from previous activities on the site. On Wednesday, June 22, 1983, Joe Fredle, Mark Henke (Technical Assistance Team - TAT), Debbie Berg (Ohio EPA) and Gary Gifford (Ohio EPA) met and devised a sampling plan for the collection of soil samples. This plan was formally presented in a memo dated June 23, 1983, from the Technical Assistance Team to Robert Bowden (see Attachment A).

During the period of June 29 through July 1, 1983, TAT members Mike Hessling and John Dourjalian conducted environmental sampling in accordance with the sampling plan. All sample locations were recorded via measurements from fixed points, such as buildings or railroad tracks. These locations are presented in Attachment B.

On June 29, a total of 40 surface soil samples were taken. Because of rain the following day, TAT was able to obtain just 8 samples at depths of 1 and 3 feet. It was at this time that TAT observed the presence of a high water table. Water was observed at the 1 and 2 foot levels at 19 sample locations and at the 3 and 4 foot levels at 2 sample locations. In addition to the presence of the high water table, TAT samplers also observed the presence of a dark, organic, creosote-like liquid at sample station number 4. One noted variance from the sampling plan which was exercised on both June 30 and July 1 was the change in sampling depth from 4 feet to 3 feet at 4 sample locations. This was due to the samplers' inability to reach the 4 foot depth because of the rather shallow occurrence of hard clay and rocks.

Sample Analysis

After the samples had been collected, TAT coordinated efforts to have them analyzed. TAT grouped the samples according to the type of analysis which was to be performed and sent them to various laboratories, depending on their capabilities and sample turnaround time. The three sample groups are Organics, Inorganics and EP Toxicity. The following discussion summarizes the pertinent information regarding the sample analysis of each group.

A total of 42 samples were taken for organic analysis. Original plans called for VIAR Analysis of these samples on a 30-day turn-around. However, due to an existing heavy work load at CLP Laboratories, only 20 of the 42 samples could be accepted and processed within the desired time frame. As a result, 20 samples were sent to a CLP Laboratory (Mead Compu/Chem) and the remaining 22 samples were sent to the Roy F. Weston Laboratory in West Chester, Pennsylvania. These samples were sent to the laboratories on July 13 and July 17, 1983, respectively. Analyses of the samples sent to Weston were performed under a TAT Special Project (TDD# 5-8307-S3).

Analytical results of the 20 samples tested by Mead Compu/Chem were received at the Central Regional Lab and the Region V Eastern District Office on October 6 and October 18, 1983, respectively. Analytical results of the 22 samples tested by the Roy F. Weston Laboratory were obtained by the Region V Eastern District Office and the Rocky River TAT office as they became available. With the exception of the volatile analyses results, all organic analyses results were received by November 23, 1983. The volatile analyses were

delayed because of equipment failure at the Weston Laboratory. To expedite the testing process, Weston sent the designated samples to Cambridge Laboratory on October 3, 1983. However, discussion with informed EPA and TAT personnel revealed that the shelf life of samples being tested for volatiles is a maximum of one month. Subsequent to these discussions, Joe Fredle cancelled the request for volatiles analyses at Cambridge Laboratory.

On July 18, 1983, a total of 36 samples were sent to the Rocky Mountain Analytical Laboratory (RMA) for inorganic analysis. The analytical results are displayed in Attachment D. They were received at the Central Regional Laboratory (CRL) on August 29, 1983, and were subsequently transmitted to the Eastern District Office. The results have not been reviewed by CRL staff to date because of resource constraints. However, Chuck Elly (CRL) indicated that, because the analyses were performed by RMA, he believes the results are accurate. If the results must be reviewed, the Eastern District Office must contact Robert Bowden and have him write a memorandum to Curtis Ross (CRL) requesting a formal review of the data.

Four samples were taken at locations #3, #6, #7 and #21 for EP Toxicity analysis. The samples were sent to California Analytical Laboratories, Inc., on July 13, 1984, and were subsequently analyzed for 8 metals and 6 herbicides. The analytical results are displayed in Attachment E. They were received at CRL on August 12, 1983, and have been determined to be acceptable for use.

Data Interpretation

As the data became available, Joe Fredle began assessing the need for an additional immediate removal at the Old Mill Site. To assist him in this effort were staff from both state and federal agencies, including Debbie Berg (Ohio EPA), Gregg Kulma (U.S. EPA), George Prince (U.S. EPA-Emergency Response Team) and Louise Fabinski (Health and Human Services - Centers for Disease Control). These officials were provided with summaries of the analytical results in forms similar to those found in Attachments C through E.

If you have any further questions regarding the sample collection, sample analysis results, or data interpretation efforts, please call.

Very truly ours,

ROY F. WESTON, INC.

Scott Springer (KSS)

Scott Springer
Assistant Technical
Assistance Team Leader

Kurt S. Stimpson
Technical Asistance Team
Leader, Region V

KSS:amp

Attachments

ATTACHMENT A

Sampling Plan for Soil Samples at
Old Mill Site in Rock Creek, Ohio

WESTON • SPER
Suite 107, Suburban West Building
20800 Center Ridge Road, Rocky River, OH 44116 • (216) 356-2130

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

TO: Robert Bowden 23 June 1983

FROM: Technical Assistance Team TAT-15-F-00010

VIA: Jack Thorsen

RE: Sampling Plan for Soil Samples at Old Mill Site in Rock Creek, Ohio

TAT was tasked by U.S. EPA-OSC Joe Fredle to complete a study and sampling plan for soil samples at the Old Mill Site in Rock Creek, Ohio. The TDD also tasked TAT to arrange for VIAR Analysis of approximately 40 samples on a 30 day turnaround. The sampling should be completed by 8 July 1983. The final report will be due two weeks after the results are available.

On Wednesday, 22 June 1983 TAT member Mark Henke and Joe Fredle met with Debbie Burge of the Ohio EPA. A sampling plan and map was devised during the discussion. (see map). Sample locations #1-9 (circles on map) will require a soil (surface) scrape, a sample at the one foot depth and a sample at the four foot depth. The samples will be analyzed for an Organic CLP and an Inorganic CLP. At locations #3, #6 and #7 an EP Toxicity sample will be taken by combining equal amounts at the surface and one foot level. All of these samples will be analyzed. Sample locations #10-20 (triangles on map) will require a soil (surface) scrape and a sample at the one foot depth only. These samples will also be analyzed for an Organic CLP and an Inorganic CLP but only the soil surface scrapes will be analyzed.

Each Organic CLP and Inorganic CLP might require an 8 oz. sample as will the three EP Toxicity samples. A total of 52 samples will be taken but only 41 will be analyzed. This does not include the field and lab reagent blank.

The map locations are approximate locations only. The exact locations of the sample points will be determined, measured and documented in the presence of Joe Fredle.

The samples will be taken by the means of a shovel, a hollow-stem auger or a slambar with possibly the aid of a gas-powered beaver.

The sampling devices will be decontaminated after each sample. This also includes decontamination inbetween the varied soil sampling depths. Great care will be used to ensure no cross-contamination via the chosen sampling devise or from the top layer of soil reaching the bottom layer during digging. Extensive field notes will be taken since the results of the sampling will determine the quantity of soil which should be removed. This operation also has potential for imposing presidence on future soil removal operations of the same magnitude within Region V.

Action levels for the contaminants believed to be on site have never been determined. The ERT personnel will review the levels of contamination once the results are available and aid EPA in determining the extent of soil removal.

Past sampling data (11-16-82) reveals organic contamination as high as 5800 ppm. This will also be reviewed and compared to the new data when determining the quantity of soil to be excavated. Biodegradiation and photodegradiation will also be reviewed between the separate sampling dates of the soil (surface) scrapes. This will be helpful in determining the present level of dangerous compounds on site.

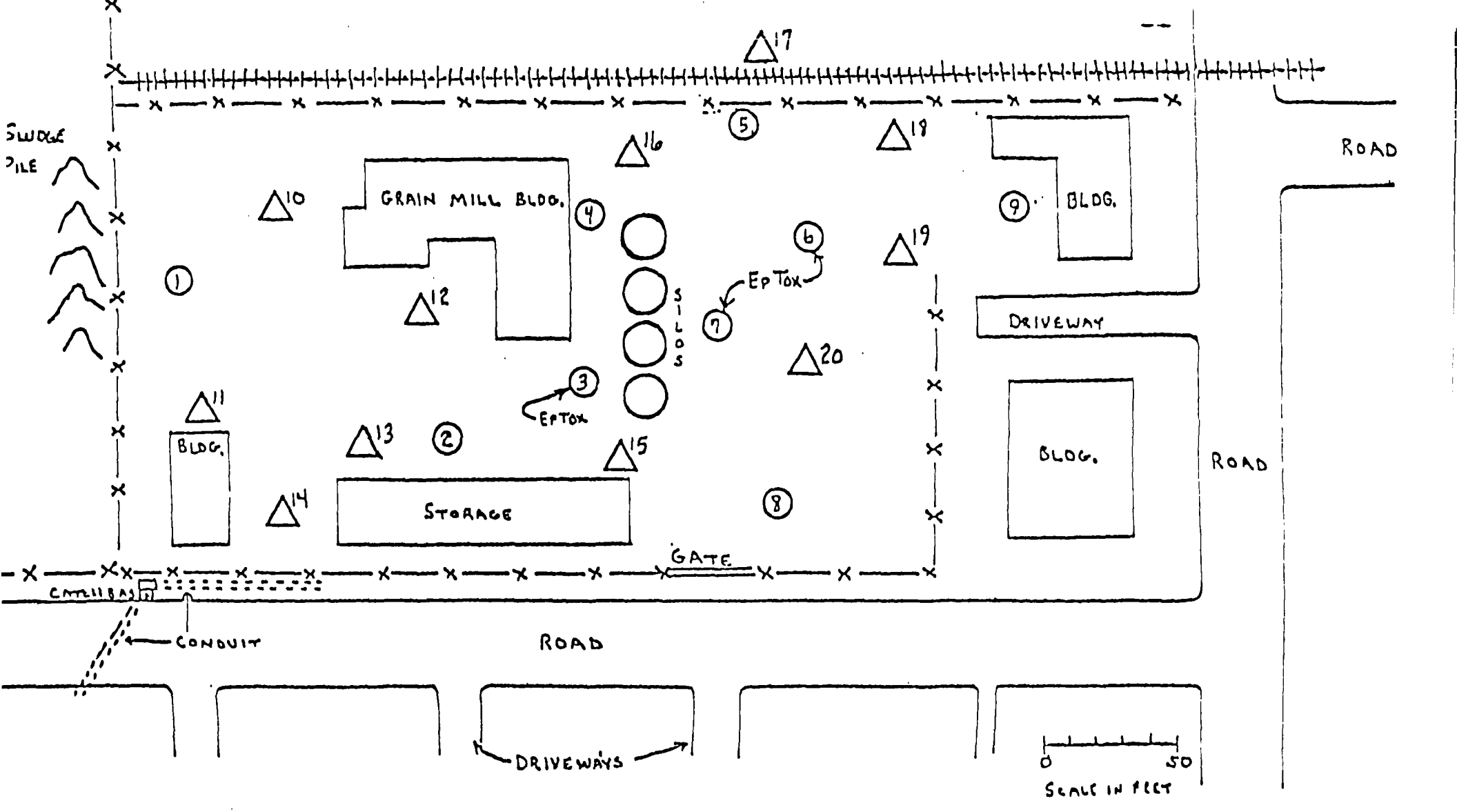
The samples will be shipped to the predesignated VIAR lab via Emery Express.

Very truly yours,

Mark E. Henke

MEH/sb

cc: Joe Fredle
Enclosures



Old Mill Site, Rock Creek, Ohio

Soil Sampling Locations

6-27-83 / 6-30-83

① - Sample Location For One Soil Scrape, One Foot Depth, Four Foot Depth - All Analysed

All - S[illegible] Locations For Soil Scrape And One Foot Depth - Soil Scrape Analysed Only

ATTACHMENT B

Sample Locations

SAMPLE LOCATIONS

Sample Location No.	Location Description
1	50' due west of the northwest corner of the building in the southeast corner of the site.
2	12' due west and approximately 45' north of the western wall of the storage building.
3	Approximately 15' south and 10' west of the southern most tip of the eastern most silo.
4	Approximately 25' east and 10' north of the northwest corner of the grain mill building.
5	30' due north of the northwest corner of the grain mill building and 3' due west of this transect line.
6	30' due north of a point equidistant between the two most western silos.
7	9' due north of the second most eastern silo.
8	6' due north and 17' due west of the northern gate post along the eastern fenceline.
9	Approximately 15' due south and 20' due west of the southeast corner of the building in the northwest corner of the site.
10	Approximately 25' due south of the southwest corner of the southern wall of the grain mill building.
11	3' due north and 6' due west of the northwest corner of the building in the southeast corner of the site.
12	8' due north and 10' due east of the northeast corner of the second most eastern wall of the grain mill building.
13	4' due west and approximately 10' north of the southwest corner of the storage building.
14	14' due west and approximately 60' due north of the southeast corner of the site.
15	3' due south and 2' due west of the northwest corner of the storage building.

SAMPLE LOCATIONS (continued)

Sample Location No.	Location Description
16	Approximately 25' due north of the northwestern corner of the grain mill building.
17	3' due west and approximately 240' due north of the intersection of the railroad tracks and the site's southern fenceline.
18	26' due south of the most southwest corner of the building in the northwest corner of the site.
19	Approximately 100' due north of a point equidistant between the two most western silos.
20	6' due north of the northern edge of the on-site drive and approximately 75' west of the eastern fenceline.
21	5' due north of the northern edge of the road bordering the site on the north and approximately 50' from the intersection directly to the east.

ATTACHMENT C

Results of Organics Analyses
of Grab Soil Samples from
Old Mill Site, Rock Creek, Ohio

Old Mill Site - Rock Creek, Ohio

CAS#	ACID COMPOUNDS	*	SAMPLE IDENTIFICATION: S01	S21	S02	S22	S03	S23	S32	S04	S24	S33	S05	S25	S06	S26	S09	S27	S08	S28	S04	S29
		**	#1 SURFACE	#1 1'	#2 SURFACE	#2 1'	#3 SURFACE	#3 1'	#3 4'	#4 SURFACE	#4 1'	#4 4'	#5 SURFACE	#5 1'	#6 SURFACE	#6 1'	#7 SURFACE	#7 1'	#8 SURFACE	#8 1'	#9 SURFACE	#9
88-06-7	2,4,6-trichlorophenol																					
59-50-7	p-chloro-m-cresol					930																
95-57-8	2-chlorophenol			1400																		
120-83-2	2,4-dichlorophenol																					
105-67-9	2,4-dimethylphenol							930						1440								680
88-75-5	2-nitrophenol																					
100-02-7	4-nitrophenol		13000																			
51-28-5	2,4-dinitrophenol																					
534-52-1	4,6-dinitro-2-methylphenol																					
87-86-5	pentachlorophenol																					
108-95-2	phenol		TRACE	1300	510									600								
	(Priority Pollutant Hazardous Substances)																					
65-85-0	benzoic acid								TRACE													
95-48-7	2-methylphenol				TRACE									2560								
108-39-4	4-methylphenol				440									1400								
95-95-4	2,4,5-trichlorophenol																					
	BASE-NEUTRAL COMPOUNDS																					
(B) 83-32-9	acenaphthene			1400	22000	1100		4300		58000	32000		400	1520	3980000	54000	720	840				
(B) 92-87-5	benzidine																					
(B) 120-82-1	1,2,4-trichlorobenzene			1200																		
(B) 118-74-1	hexachlorobenzene																					
(B) 67-72-1	hexachloroethane																					
(B) 111-44-4	bis(2-chloroethyl)ether																					
(B) 91-58-7	2-chloronaphthalene																					
(B) 95-50-1	1,2-dichlorobenzene																					
(B) 541-73-1	1,3-dichlorobenzene																					
(B) 106-46-7	1,4-dichlorobenzene			1200																		
(B) 91-94-1	3,3'-dichlorobenzidine																					
(B) 121-14-2	2,4-dinitrotoluene			TRACE																		
(B) 606-20-2	2,6-dinitrotoluene																					
(B) 122-66-7	1,2-diphenylhydrazine (as azobenzene)																					
(B) 206-44-0	fluoranthene		TRACE	440	85000	2500		2300		150000	67000		1500	3200	4100000	51000	4400	1300	2700	540	TRACE	
(B) 7005-72-3	4-chlorophenyl phenyl ether																					
(B) 101-55-3	4-bromophenyl phenyl ether																					
(B) 39638-32-9	bis-(2-chloroisopropyl)ether																					
(B) 11-91-1	bis-(2-chloroethoxy)methane																					
(B) 87-68-3	hexachlorobutadiene																					
(B) 77-47-4	hexachlorocyclopentadiene																					
(B) 78-59-1	isophorone																					
(B) 91-20-3	naphthalene			640	34000	2600		1300		42000	5200		TRACE	3360		18000	6000	1000	1000	400	640	
(B) 98-95-3	nitrobenzene																					
(B) 86-30-6	N-nitrosodiphenylamine												TRACE				6800					
(B) 621-64-7	N-nitrosodi-n-propylamine			6200																		
(B) 117-81-7	bis(2-ethylhexyl)phthalate		890					420					TRACE	TRACE					3700000	520		
(B) 85-68-7	butyl benzyl phthalate																		TRACE			
(B) 84-74-2	di-n-butyl phthalate			1300																		
(B) 117-84-0	di-n-octyl phthalate																		3600			
(B) 84-66-2	diethyl phthalate																		TRACE			
(B) 131-11-3	dimethyl phthalate																					
(B) 56-55-3	benzo(a)anthracene			TRACE	26000	1100		TRACE		240000	6400		600	1080	TRACE	TRACE	1600	520	2400	TRACE	400	

* Station Number

* Sample Location/Sample Depth

Note: Where not reported, the compounds were below detectable limits.

Results of Organics Analyses of Grab Soil Samples (ppb)

Old Mill Site - Rock Creek, Ohio

		Sample Identification																			
*		S01	S21	S02	S22	S03	S23	S32	S04	S24	S33	S05	S25	S06	S26	S07	S27	S08	S28	S09	S.
**	BASE/NEUTRAL COMPOUNDS	#1 / SURFACE	#1 / 1'	#2 / SURFACE	#2 / 1'	#3 / SURFACE	#3 / 1'	#3 / 4'	#4 / SURFACE	#4 / 1'	#4 / 4'	#5 / SURFACE	#5 / 1'	#6 / SURFACE	#6 / 1'	#7 / SURFACE	#7 / 1'	#8 / SURFACE	#8 / 1'	#9 / SURFACE	#9 /
CAS#																					
50-32-8	benzo(a)pyrene			31000	TRACE				84000				360			480		3400			
205-99-2	benzo(b)fluoranthene			2300					23000			1300	2400			1100	TRACE	3200	1000		
207-08-9	benzo(k)fluoranthene			69000	2300		410		230000			1300					TRACE	3400	1000		
218-01-9	chrysene		TRACE	15000	1100		450		240000	14000		360	360	470000	TRACE	1300	580	2800	TRACE	400	
208-96-8	acenaphthylene			13000	450				TRACE				TRACE								
120-12-7	anthracene			17000	630		610		64000	16000			1300	560000	TRACE	600		440			
191-24-2	benzo(ghi)perylene			19000					41000				TRACE							TRACE	
86-73-7	fluorene			12000	690		410		26000	11000		TRACE	1100	810000	17000	840	TRACE	TRACE			
85-01-8	phenanthrene	400	560	100000	3800		2600		110000	41000		1000	3300	5100000	82000	6400	1200	2300	640	360	TRA
53-70-3	dibenzo(a,h)anthracene																				
193-39-5	Indeno(1,2,3-cd)pyrene			24000	950				56000				TRACE							TRACE	
129-00-0	pyrene	410	2100	81000	2100		1800		210000	35000		1900	1800	2400000	46000	2900	1400	6000	640	520	
	(Non-Priority Pollutant Hazardous Substances)																				
87-33-3	galline	12000																			
100-51-6	benzyl alcohol																				
106-47-8	4-chloroaniline																				
132-64-9	dibenzofuran		TRACE	35000	920		1500		34000	10000		400	1800	2100000	41000	2600	320	440	TRACE	TRACE	
91-57-6	2-methylnaphthalene		1100	22000	1300		2100		TRACE				2360		23000	12000	1200	1400	1000	1000	
88-74-4	2-nitroaniline																				
99-09-2	3-nitroaniline																				
100-01-6	4-nitroaniline	34000																			
	VOLATILES																				
CAS#																					
107-02-8	acrolein																				
107-13-1	acrylonitrile																				
71-43-2	benzene																	TRACE			
56-23-5	carbon tetrachloride																				
108-90-7	chlorobenzene																				
107-06-2	1,2-dichloroethane																				
71-55-6	1,1,1-trichloroethane												36								
75-34-3	1,1-dichloroethane		7																		
79-00-5	1,1,2-trichloroethane	TRACE			TRACE																
79-34-5	1,1,2,2-tetrachloroethane																	TRACE			
75-00-3	chloroethane																				
110-75-8	2-chloroethylvinyl ether																				
67-66-3	chloroform																				
75-35-4	1,1-dichloroethene																				
156-60-5	1,2-trans-dichloroethene	TRACE	140	5	66	11	9						5.5			6.5			6		
78-87-5	1,2-dichloropropane																				
10061-02-6	trans-1,3-dichloropropene																				
10061-01-05	cis,1,3-dichloropropene																				
100-41-4	ethylbenzene	3	31			5.2	310						5.5		TRACE					TRACE	
75-09-2	methylene chloride	44	5		49	18	TRACE	4	33	6	TRACE	38		2.9		9.1	TRACE	5.6	7	TRACE	
74-87-3	chloromethane																				
74-83-9	bromomethane																				
75-25-2	bromoform																				
75-27-4	bromodichloromethane																				
75-69-4	fluorotrichloromethane				TRACE	TRACE			TRACE		TRACE					TRACE		TRACE	7		
124-48-1	chlorodibromomethane																				
127-18-4	tetrachloroethene	38	3	22	100	4.7				TRACE			350		7	220		TRACE	5		
108-88-3	toluene	4	13		12	TRACE	23						52								
79-01-6	trichloroethene	850	69	49	840	130	13		7.4	2.5		3.9	530		TRACE	11000	16000	22	5K		
75-01-4	vinyl chloride		22																		

* Station Number

** Sample Location/Sample Depth

Results of Organics Analyses of Grab Soil Samples (ppb)

Old Mill Site - Rock Creek, Ohio

		Sample Identification																			
*		S01	S21	S02	S22	S03	S23	S32	S04	S24	S33	S05	S25	S06	S26	S07	S27	S08	S28	S09	S29
**		#1 SURFACE	#1 1'	#2 SURFACE	#2 1'	#3 SURFACE	#3 1'	#3 4'	#4 SURFACE	#4 1'	#4 4'	#5 SURFACE	#5 1'	#6 SURFACE	#6 1'	#7 SURFACE	#7 1'	#8 SURFACE	#8 1'	#9 SURFACE	#9
Priority Pollutant Hazardous Substances)																					
67-64-1	acetone							6400						330				63			
78-93-3	2-butanone							1900										TRACE			
75-15-0	carbondisulfide																				
519-78-6	2-hexanone							54										TRACE			
108-10-1	4-methyl-2-pentanone						140	160													
100-42-5	styrene												TRACE								
108-05-4	vinyl acetate																				
95-47-6	o-xylene	49	14			92	1030			10			32		10					300	24
	PESTICIDES																				
CAS#																					
) 309-00-2	aldrin																				
) 60-57-1	dieldrin																				
) 57-74-9	chlordane																				
) 50-29-3	4,4'-DDT																				
) 72-55-9	4,4'-DDE																	12.3	260		
) 72-54-8	4,4'-DDD																				
) 115-29-7	endosulfan I																				
) 115-29-7	endosulfan II																				
) 1031-07-8	endosulfan sulfate																				
) 72-20-8	endrin																				
) 7421-43-4	endrin aldehyde																				
P) 76-44-8	heptachlor																				
P) 1024-57-3	heptachlor epoxide																				
P) 319-84-6	BHC-Alpha																				
P) 319-85-7	BHC-Beta																				
P) 319-86-8	BHC-Delta																				
P) 58-89-9	BHC-Gamma																				
P) 53469-21-9	PCB-1242																				
P) 11097-69-7	PCB-1254	11												2800							
P) 11104-28-2	PCB-1221																				
P) 11141-16-5	PCB-1232																				
P) 12672-29-6	PCB-1248																				
P) 11096-82-5	PCB-1260							49.9					660								
P) 12674-11-2	PCB-1016																				
P) 8001-35-2	toxaphene																				
	DIOXINS																				
98) 1746-01-6	2,3,7,8-tetrachlorodibenzo-p-dioxin																				

* Station Number

* Sample Location/Sample Depth

ote: Where not reported, the compounds were below detectable limits.

Results of Organics Analyses of Grab Soil Samples (ppb)

Old Mill Site - Rock Creek, Ohio

	Sample Identification																		
*	S30	S31	S34	S35	S39	S46	S36	S37	S38	S10	S11	S12	S13	S14	S15	S16	S17	S18	S19	S2
**	#1 / 3'	#2 / 3'	#5 / 3'	#6 / 4'	#6 / 4'	#7 / 3	#7 / 4'	#8 / 3'	#9 / 4'	#10 / surface	#11 / surface	#12 / surface	#13 / surface	#14 / surface	#15 / surface	#16 / surface	#17 / surface	#18 / surface	#19 / surface	#16 / 4'
Base-Neutral Compounds																				
Dichlorobenzene																				
Dichlorobenzene																				
Dichlorobenzene																				
' Dichlorobenzidine																				
thyl Phthalate	140	110	80	180	560			32											700	60
othyl Phthalate																				420
n-Butyl Phthalate	1950	540	3800	695	120	890	330	100	370	910	770	920						3700	6600	
Dinitrotoluene																				
Dinitrotoluene																				
n-Octyl Phthalate																				
Diphenyl hydrazine																				
oranthene				104	42						580				730		390			44
orene				2600							180									
achlorobenzene																				
achlorobutadiene																				
achlorocyclopentadiene																				
achloroethane																				
lene (1,2,3-cd) Pyrene																				
phorone						130												100		9
thalene	120	170	60			14000				1800	1300	2000	311000	780	240	4,500	18000	49000	2100	400
robenzene																				
trosodimethylamine																				
troso di-n-propylamine																				
trosodiphenylamine																				
nanthrene																				
ene		90			30						2300									
,4 Trichlorobenzene																				
PCBs																				
Arclor 1254	130		***			257		9.6	25.4	206		206	2500		2.4		21.3	56.7	2 11	242
Arclor 1260	56.3		***		11000	74.5	3.2			113	17300	156	910	3.2	67	689	158	46.2		53

' Station Number

' Sample Location/Sample Depth

' No results were received for this sample.

Results of Organics Analyses of Grab Soil Samples (ppb)

Old Mill Site - Rock Creek, Ohio

	Sample Identification																		
*	S30	S31	S34	S35	S39	S46	S36	S37	S38	S10	S11	S12	S13	S14	S15	S16	S17	S18	S19	S20
**	#1 3'	#2 3'	#5 3'	#6 4'	#6 4'	#7 SURFACE	#7 4'	#8 3'	#9 4'	#10 SURFACE	#11 SURFACE	#12 SURFACE	#13 SURFACE	#14 SURFACE	#15 SURFACE	#16 SURFACE	#17 SURFACE	#18 SURFACE	#19 SURFACE	#20 SURFACE
Acid Compounds																				
Chlorophenol																				
4 Dichlorophenol																				
4 Dimethylphenol													92							
6 Dinitro-O-Cresol																				
4 Dinitrophenol																				
Nitrophenol																				
Nitrophenol																				
Chloro-M-Cresol																				
entachlorophenol																				
henol																				
,4,6 Trichlorophenol																				
Base-Neutral Compounds																				
enaphthene			80															680		
enaphthylene																	1800			
thracene	150	150	210	99	34	11000				1900	3400	1600	94000	540	553	74000	7300	4600	7000	160
nzidine																				
nzo(a) Anthracene																				
nzo(a) Pyrene																				
4 Benzo-fluoranthene																				
nzo(ghi) Perylene																				
nzo (k) fluoranthene																				
s (2-chloroethoxy) Methane																				
s (2-chloroethyl) ether																				4
s (2-chloroisopropyl) ether			TRACE																	340
s (2-ethyl hexyl) phthalate	920	260	100	1320	11000	270	19950	1800	22000										1700	
Bromophenyl phenyl ether																				
tyl Benzyl Phthalate																				
Chloronaphthalene																				
Chlorophenyl phenyl ether																				
rysene																				
benzo(a,h) Anthracene																				

* Station Number

* Sample Location/Sample Depth

ote: Where not reported, the compounds were below detectable limits.

Results of Organics Analyses of Grab Soil Samples (ppb)

Old Mill Site - Rock Creek, Ohio

	Sample Identification																			
*	544	545	Blank																	
**	#21 Surface	#21 1'																		
Acid Compounds																				
Chlorophenol																				
,4 Dichlorophenol																				
,4 Dimethylphenol																				
,6 Dinitro-O-Cresol																				
,4 Dinitrophenol																				
Nitrophenol																				
Nitrophenol																				
Chloro-M-Cresol																				
entachlorophenol																				
henol																				
,4,6 Trichlorophenol																				
Base-Neutral Compounds																				
enaphthene																				
enaphthylene	230	22																		
thracene	620	110																		
nzidine																				
nzo(a) Anthracene	470																			
nzo(a) Pyrene	740																			
4 Benzo-fluoranthene	2400																			
nzo(ghi) Perylene																				
nzo (k) fluoranthene																				
s (2-chloroethoxy) Methane																				
s (2-chloroethyl) ether																				
s (2-chloroisopropyl) ether	1<X<10		77																	
s (2-ethyl hexyl) phthalate	12100	4300	260																	
Bromophenyl phenyl ether																				
tyl Benzyl Phthalate																				
Chloronaphthalene																				
Chlorophenyl phenyl ether																				
rysene	520																			
benzo(a,h) Anthracene																				

* Station Number

* Sample Location/Sample Depth

ote: Where not reported, the compounds were below detectable limits.

Results of Organics Analyses of Grab Soil Sample (ppb)

Old Mill Site - Rock Creek, Ohio

	Sample Identification																		
*	544	545	Blank																
**	#21 Surface	#21 1'																	
Base-Neutral Compounds																			
1,2 Dichlorobenzene																			
1,3 Dichlorobenzene																			
1,4 Dichlorobenzene																			
3,3' Dichlorobenzidine																			
Diethyl Phthalate	190		90																
Dimethyl Phthalate	4	1<X<10																	
Di-N-Butyl Phthalate	160	170	840																
2,4 Dinitrotoluene																			
2,6 Dinitrotoluene																			
Di-N-Octyl Phthalate																			
1,2 Diphenyl hydrazine																			
Fluoranthene	890	190																	
Fluorene																			
Hexachlorobenzene																			
Hexachlorobutadiene																			
Hexachlorocyclopentadiene																			
Hexachloroethane																			
Indeno (1,2,3-cd) Pyrene	310																		
Isophorone																			
Naphthalene	23	74																	
Nitrobenzene																			
N-Nitrosodimethylamine																			
N-Nitroso di-N-propylamine																			
N-Nitrosodiphenylamine																			
Phenanthrene																			
Pyrene	730	150																	
1,2,4 Trichlorobenzene																			
PCBs																			
Arclor 1254																			
Arclor 1260	8.8	81.4																	

* Station Number

* Sample Location/Sample Depth

ote: Where not reported, the compounds were below detectable limits.

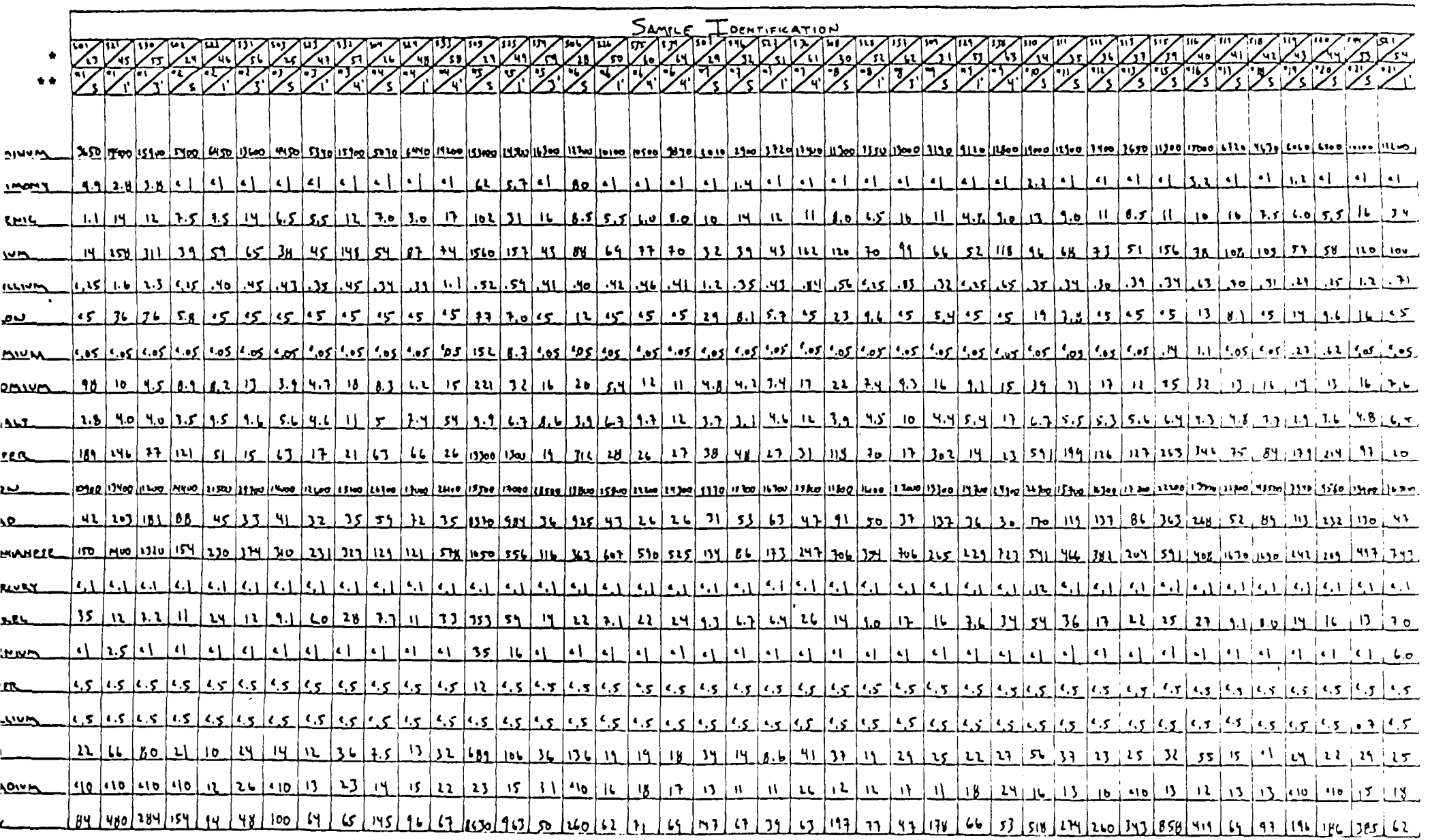
ATTACHMENT D

Results of Metals Analyses of
Grab Soil Samples from
Old Mill Site, Rock Creek, Ohio

Results of Metals Analyses of

Grab Soil Samples (ppm)

Old Mill Site - Rock Creek, Ohio



* Station number / Traffic report number - ME09__

ATTACHMENT E

Results of EP Toxicity Analyses
of Grab Soil Samples from
Old Mill Site, Rock Creek, Ohio

Results of EP Toxicity Analyses of
Grab Soil Samples (mg/L in Leachate)
Old Mill Site - Rock Creek, Ohio

	Sample Identification				
Station No.	CY13S40	CY13S41	CY13S41	CY13S42	CY13S43
Sample Location	3	6	6	7	21
Parameter					
•Organics					
Endrin	<0.0025	<0.0025	<0.0025	<0.0025	<0.0025
Lindane	<0.04	<0.04	<0.04	<0.04	<0.04
Methoxychlor	<1	<1	<1	<1	<1
Toxaphene	<0.05	<0.05	<0.05	<0.05	<0.05
2,4-D	<0.4	<0.4	<0.4	<0.4	<0.4
2,4,5-TP	<0.04	<0.04	<0.04	<0.04	<0.04
•Inorganics					
Arsenic	<2.5	<2.5	<2.5	<2.5	<2.5
Barium	<50	<50	<50	<50	<50
Calmium	<0.5	<0.5	<0.5	<0.5	<0.5
Chromium	<2.5	<2.5	<2.5	<2.5	<2.5
Lead	<2.5	<2.5	<2.5	<2.5	<2.5
Mercury	<0.1	<0.1	<0.1	0.11	<0.1
Selenium	<0.5	<0.5	<0.5	<0.5	<0.5
Silver	<2.5	<2.5	<2.5	<2.5	<2.5

APPENDIX L

SITE SAFETY PLAN

Site Safety Plan

Old Mill Site, Rock Creek, Ohio

I. Incident Description

1. Location: Intersection of Station Street and Mill Street, Village of Rock Creek, Ashtabula County, Ohio.

2. Type of Site: Hazardous waste site.

3. Response Objectives: Construct a six foot high, chain link fence around the perimeter of the Old Mill Site.

4. Site Map: Attached

II. Site Description

1. Size: 1.2 acres

2. Surrounding Population: Residential area east of site.

3. Buildings: See attached map.

4. Topography: Flat

III. Personnel Protection

1. Level of Protective Clothing: Level D

2. Site Instrument Readings:

   a. % LEL - O
   b. HNU - Background

3. Was protective level upgraded? No

4. Protective Clothing:

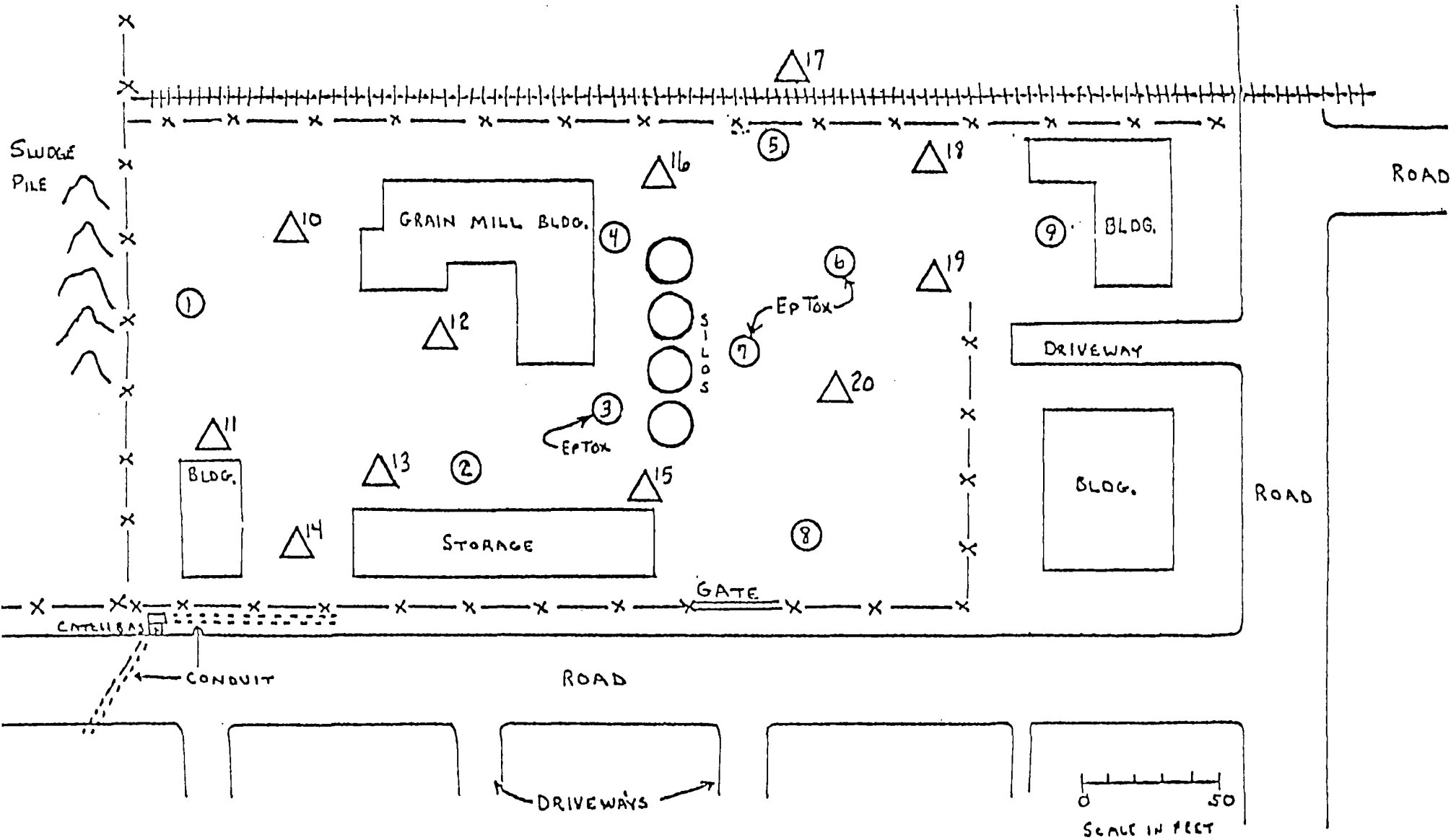
   a. Steel toe boots
   b. Eye protection
   c. Disposable work gloves

IV. Emergency Information

1. Nearest Telephone: E. Hall (Resident - 563-3069)
   Rock Creek Aluminum Co. (563-3487)

2. Sources of Help:

	Name	Town	Phone
Fire	Rock Creek Fire Dept.	Rock Creek	563-3333
Police	Rock Creek Police Dept.	Rock Creek	576-4901
Ambulance	Rock Creek Fire Dept.	Rock Creek	576-6600
Hospital	Ashtabula General	Ashtabula	998-3111
Airport	Ashtabula County	Ashtabula	275-3821
Heliport	Ashtabula County	Ashtabula	275-3821
Poison Information	Poison Control Center-Academy of Medicine	Cleveland	231-4455



Old Mill Site, Rock Creek, Ohio

Soil Sampling Locations

6-27-83 / 6-30-83

① - Sample Location For One Soil Scrape, One Foot Depth, Four Foot Depth - All Analysed

△12 - Sample Location For Soil Scrape And One Foot Depth - Soil Scrape Analysed Only

APPENDIX M

CORRESPONDENCE

WESTON • SPER
Suite 107, Suburban West Building
20800 Center Ridge Road, Rocky River, OH 44116 • (216) 356-2130

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

TO: Robert Bowden 23 June 1983

FROM: Technical Assistance Team TAT-15-F-00010

VIA: Jack Thorsen

RE: Sampling Plan for Soil Samples at Old Mill Site in Rock Creek, Ohio

TAT was tasked by U.S. EPA-OSC Joe Fredle to complete a study and sampling plan for soil samples at the Old Mill Site in Rock Creek, Ohio. The TDD also tasked TAT to arrange for VIAR Analysis of approximately 40 samples on a 30 day turnaround. The sampling should be completed by 8 July 1983. The final report will be due two weeks after the results are available.

On Wednesday, 22 June 1983 TAT member Mark Henke and Joe Fredle met with Debbie Burge of the Ohio EPA. A sampling plan and map was devised during the discussion. (see map). Sample locations #1-9 (circles on map) will require a soil (surface) scrape, a sample at the one foot depth and a sample at the four foot depth. The samples will be analyzed for an Organic CLP and an Inorganic CLP. At locations #3, #6 and #7 an EP Toxicity sample will be taken by combining equal amounts at the surface and one foot level. All of these samples will be analyzed. Sample locations #10-20 (triangles on map) will require a soil (surface) scrape and a sample at the one foot depth only. These samples will also be analyzed for an Organic CLP and an Inorganic CLP but only the soil surface scrapes will be analyzed.

Each Organic CLP and Inorganic CLP might require an 8 oz. sample as will the three EP Toxicity samples. A total of 52 samples will be taken but only 41 will be analyzed. This does not include the field and lab reagent blank.

The map locations are approximate locations only. The exact locations of the sample points will be determined, measured and documented in the presence of Joe Fredle.

The samples will be taken by the means of a shovel, a hollow-stem auger or a slambar with possibly the aid of a gas-powered beaver.

The sampling devices will be decontaminated after each sample. This also includes decontamination inbetween the varied soil sampling depths. Great care will be used to ensure no cross-contamination via the chosen sampling devise or from the top layer of soil reaching the bottom layer during digging. Extensive field notes will be taken since the results of the sampling will determine the quantity of soil which should be removed. This operation also has potential for imposing presidence on future soil removal operations of the same magnitude within Region V.

Action levels for the contaminants believed to be on site have never been determined. The ERT personnel will review the levels of contamination once the results are available and aid EPA in determining the extent of soil removal.

Past sampling data (11-16-82) reveals organic contamination as high as 5800 ppm. This will also be reviewed and compared to the new data when determining the quantity of soil to be excavated. Biodegradiation and photodegradiation will also be reviewed between the separate sampling dates of the soil (surface) scrapes. This will be helpful in determining the present level of dangerous compounds on site.

The samples will be shipped to the predesignated VIAR lab via Emery Express.

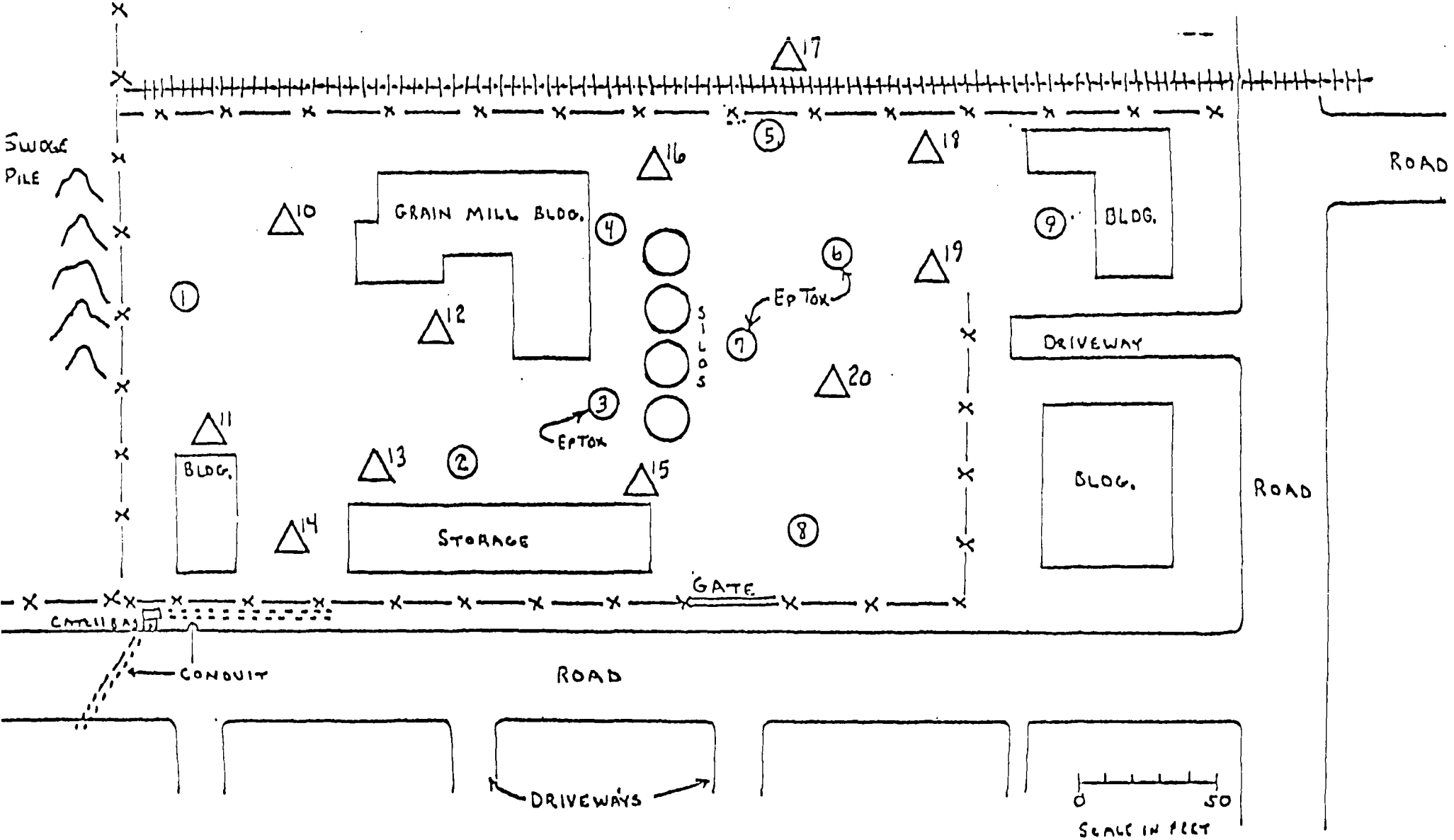
Very truly yours,

Mark Henke

Mark E. Henke

MEH/sb

cc: Joe Fredle
Enclosures



Old Mill Site, Rock Creek, Ohio

Soil Sampling Locations

6-27-83 / 6-30-83

① - Sample Location For One Soil Scrape, One Foot Depth, Four Foot Depth - All Analysed

A12 - C [illegible] End Soil Scrape And One Foot Depth - Soil Scrape Analysed Only

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Centers for Disease Control

Memorandum

Date .December 6, 1983

From Chief, Superfund Implementation Group, CEH

Subject Old Mill Site
Rock Creek, Ohio

To Louise A. Fabinski
Public Health Advisor
EPA Region V

The information you submitted for the subject site has been reviewed by a committee in the Center for Environmental Health, Centers for Disease Control. The following comments are provided, I hope that you find them useful.

Background

CDC reviewed this site in early 1983. It apparently was a waste disposal operation, though we have little or no background narrative. Leaking drums have apparently been removed from the site, but some soil contamination remains. Dr. Edith Welty made a site visit.

Conclusion

Based on the data reviewed, the site does not appear to pose a serious or acute threat to the public health.

Groundwater contamination and its extent needs to be defined before cleanup of the site can be properly addressed.

Restriction of human access to the site should be considered pending cleanup.

Discussion

Two questions are posed in the cover memo with a new set of soil values:

- Can CDC set safe soil clean-up values for the inorganics and organic carcinogens?

- Should any further immediate removal be undertaken?

Regarding the first question, we understand that EPA is in the process of developing a method to begin setting safe clean-up levels for various compounds involved in hazardous waste sites. Therefore, in non-emergency situations, CEH will defer to EPA.

With regard to further immediate removal action, it is difficult to make a recommendation based on soil levels alone. A single high value of 8,000 ppm for lead was reported from sample site 5, near the railroad track. A single positive value probably does not indicate amounts of lead large enough to cause a public health hazard, as long as access is denied to small children who might play in this area.

In addition the concentration of Polynuclear Aromatic Hydrocarbons (PAH's) at sample locations 2, 4, 6, and 7 appear to be high. Localized cleanup of these areas might be considered. To place PAH contamination in perspective, the unfenced railroad adjacent to the site probably has crossties containing higher levels than does the soil on-site.

Human Contact

The major potential pathways for human exposure observed during Dr. Welty's site visit were:

- direct contact, and
- groundwater pollution.

Regarding direct-contact, the map attached to the report indicates the site is only partially fenced. Adequate fencing, or alternate measures to restrict access, should be assured so that small children do not enter and play on the site.

Regarding groundwater pollution, no groundwater data were provided in this report and we have no data as to which aquifer is used by nearby residents. Given the number of industries in the area, and the expense and difficulty of adequately monitoring groundwater, it might be prudent for local residents to switch to the public water supply. Capping the site to prevent additional leachate from entering the groundwater, and the installation of monitoring wells may be advisable.

Analytical data

Quality assurance comments indicate that quality control limits were not specified and blanks were not run. Quality control information was limited to one recovery experiment.

Four pages of undated handwritten results were presented. Insufficient information was provided for interpretation. The information on the forms was difficult to interpret as to location and type of specimen analyzed. Data supplied by the November 21, 1983 memorandum could not be correlated to sample locations at the site. The practice of mixing units (ppm and ppb) in the same table is especially misleading to a reviewer.

In order to appropriately interpret data of this nature, we need a statement explaining location and type of specimen collected, method used for analysis, and sensitivity, accuracy and precision (based on quality control results) of the method. Although well identified raw data can be very useful to supplement reports, summaries designed to guide the reviewer are essential.

Georgi Jones

DOCUMENTS REVIEWED

1. Superfund Record of Communications from Louise Fabinski, CEH/SIG, US EPA Region V to G. Jones, October 27, 1983.

2. Memorandum from Georgi A. Jones to Peter McCumiskey, Public Health Advisor, Region 5, January 14, 1983.

3. Memorandum and data from analytical results of Old Mill Site soil sampling from Scott Springer, Technical Assistance Team, Region V to Emergency Response Team, US EPA.

4. Superfund Record of Communications from Louise Fabinski, CEH/SIG, US EPA Region V to G. Jones, November 21, 1983.

UNITED STATES GOVERNMENT

memorandum

DATE: December 29, 1983

REPLY TO ATTN OF: George R. Prince, Environmental Scientist
Environmental Response Team

SUBJECT: Old Mill Site - Rock Creek, Ohio: Review of Available Soil Data

TO: Joseph Fredle, On-Scene Coordinator
EPA, Region V

I have reviewed the soil data you provided me from samples collected and analyzed by Region V's TAT team during 1982 and 1983. The primary organic compounds present on the site in elevated concentrations include polynuclear aromatic hydrocarbons (PAH) and some volatile priority pollutants (primarily trichloroethylene, tetrachloroethylene, ethylbenzene and dimethylbenzene isomers).

The two attached maps show the location of elevated levels of organics in the soils on-site. Elevated levels of volatile organics found in samples taken in November 1982, were present in roughly the same locations contaminated with high levels of PAH in November 1982 samples and June 1983 samples. The majority of soils on the site contain much lower levels of PAH's (<10ppm), which may be near background levels for this industrial area. Background samples should be taken to test this hypothesis. Organic contaminants did not penetrate soils to 3-4 levels except for station 6 where low levels of fluorene were detected. The major "hot spots" on-site appear to be discrete areas around the silos and in front of the storage area. Having not visited the site myself, it is difficult to accurately assess the source of contamination or the form in which it is present. However, through conversations with you and other persons who have been at the site, the contaminant appeared to be present in spillage and leakage of solvents and oils from drums previously stored on site. Since attenuation of contaminants in soil appears to be rapid, it is likely that the volume of spillage was relatively small. In most cases contaminated areas are probably visible as solvent/oil-stained soils.

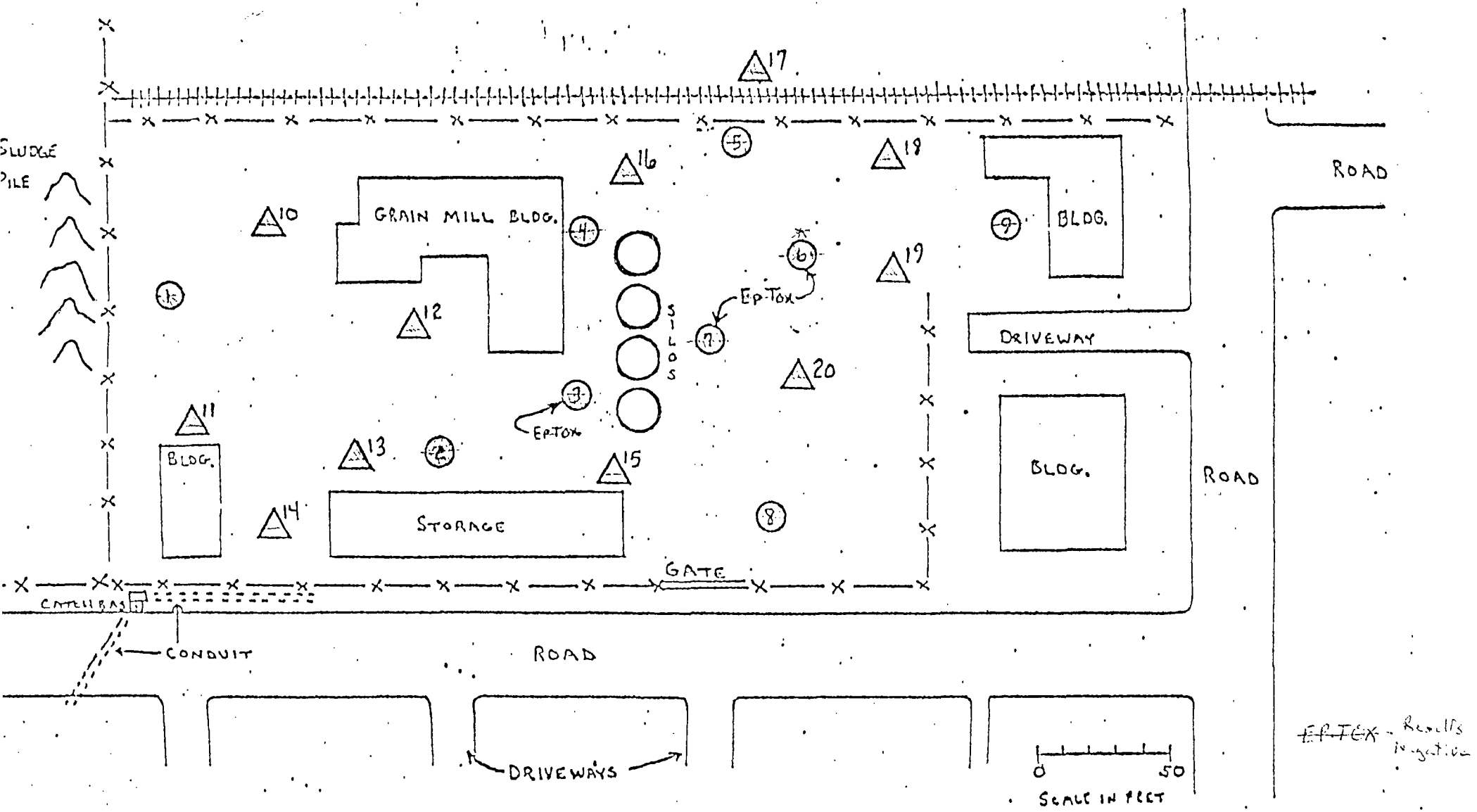
OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

☆U.S. GOVERNMENT PRINTING OFFICE : 1982 0 - 361-526 (7290)

The presence of inorganic contaminants at Old Mill was evaluated by EP Toxicity tests and analysis of samples for priority pollutant metals. Three samples analyzed for EP Toxicity were negative indicating that immediate removal operations on the basis of surface water or leachate contamination by pesticides or inorganics, i.e., arsenic, barium, cadmium, chromium, mercury, lead, selenium and silver are not warranted. Aluminum was present in many soil samples in high concentrations, due to the presence of nearby off-site piles of aluminum dross. The origin of the aluminum does not appear to be directly related to wastes disposed on the Old Mill site, hence is probably in higher concentrations outside the site boundaries. If need be (e.g., if exposure to aquatic organisms presents toxicity problems) aluminum should be dealt with as a separate site problem.

The objective of ERT's data review is to determine the necessity for further immediate removal operations regarding soils at the Old Mill site. The available data indicate that aside from certain "hot spots" (station 2,4,5,6 and 7) the majority of soils on-site do not exceed "background levels" of PAH and volatile organics. As mentioned in CDC's December 6, 1983 memo to Louise A. Fabinski, immediate measures should be taken to secure site area to prohibit unauthorized personnel from coming in contact with heavily contaminated soils.

From an environmental standpoint, there is a potential for long-term transport of contaminated soils off-site by surface water runoff or percolation of contaminated water into the water table aquifer. Based on the relatively flat site terrain, the localized nature of soil contamination, and the observed attenuation of PAH within the first foot of soil, runoff and potential groundwater contamination present potential long-term environmental problems. These should be addressed as part of the on-going remedial actions at this facility.



Old Mill Site; Rock Creek, Ohio

Soil Sampling Locations

6-27-83 / 6-30-83

Conc. (mg/kg) PNA in Soils

1 > PNA

1 < PNA < 10

10 < PNA

⊖ Surface sample

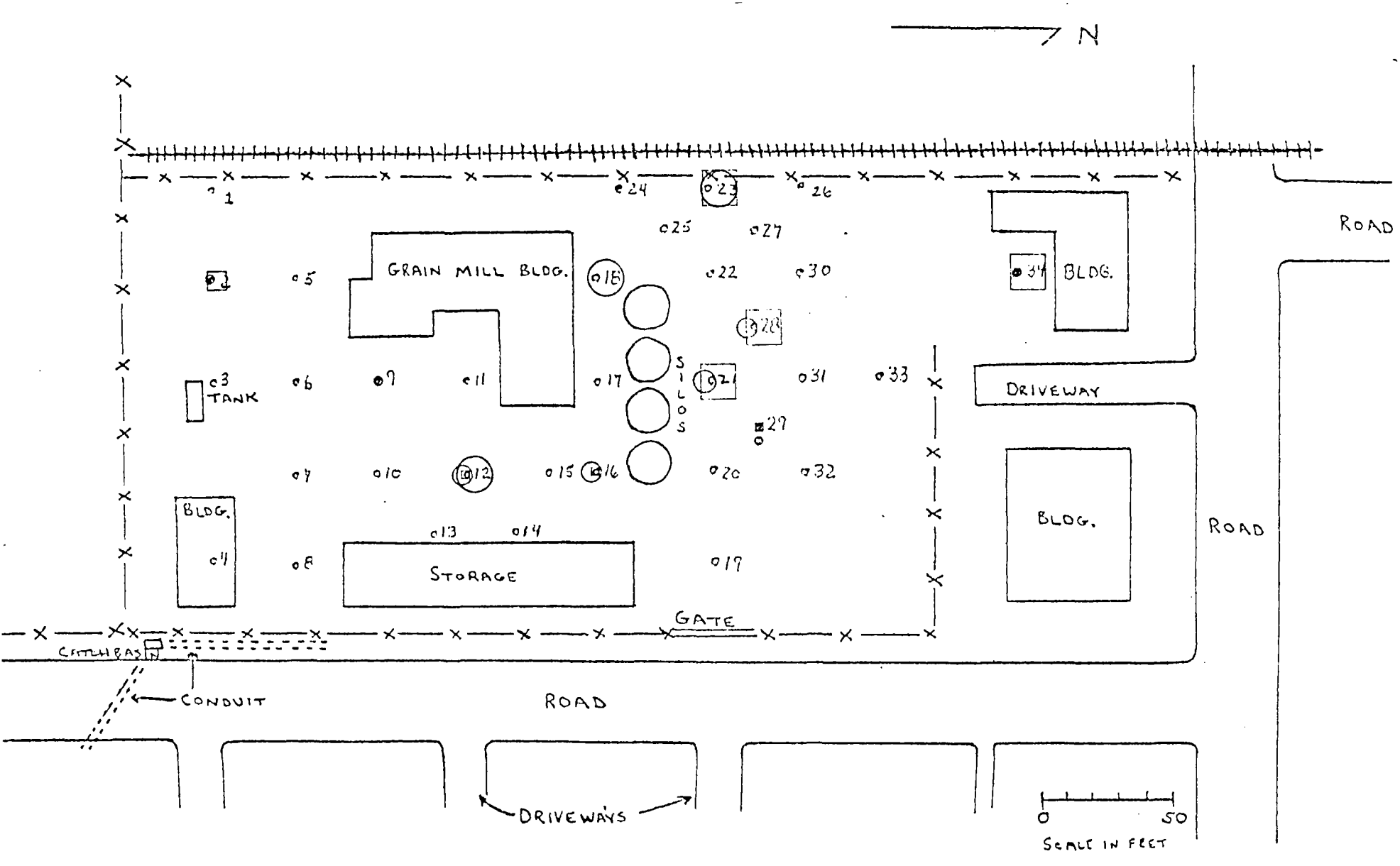
1' sample

* Deep sample contaminated

① - Sample Location For One Soil Scrape, One Foot Depth, Four Foot Depth - All Analysed

△12 - Sample Location For Soil Scrape And One Foot Depth - Soil Scrape Analysed Only

Ep Tox Sample Were Designated.



Total PNA

< PNA < 100 ----- •

< PNA < 1000 ----- ○

100 < PNA ----- ◯

Old Mill Site, Rock Creek, Ohio

Soil Sampling Locations
November 16, 1982
TDD # 5-8211-4

Total Volatile Priority Pollutants

□ ..... 10 < X mg/kg < 100

□ ..... 100 < TVPP < 1000

□ ..... 1000 < TVPP

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Centers for Disease Control

Memorandum

Date February 6, 1984

From Chief, Superfund Implementation Group

Subject Old Mill Site
Rock Creek, Ohio

To Louise Fabinski
Public Health Advisor
EPA Region V

In my memo of December 6, 1983 regarding this site two seemingly diametrically opposed conclusions were included:

- one which said that the site does not appear to pose a serious or acute threat to the public health, and,
- a second which said that human access to the site should be restricted pending cleanup.

I would like to provide the following clarification of the intent of these conclusions.

In the body of the memo it was specifically stated that:

"A single (high) positive value probably does not indicate amounts of lead large enough to cause a public health hazard, as long as access is denied to small children who might play in this area."

and again that:

"Adequate fencing, or alternate measures to restrict access, should be assured so that small children do not enter and play on the site."

These two statements indicate that in the mind of CDC the presence of lead at the level found is a significant potential health hazard to a specific segment of the public, however, that by instituting a method of restricting access, the site would not be considered an imminent health hazard pending cleanup.

An immediate cleanup of the lead contamination could be instituted rather than fencing the site. However, in order to determine the extent of cleanup required a substantial sampling effort would be necessary, as the available data is insufficient to identify the extent of lead contamination. In addition, some type of site restriction should be instituted until the results of this sampling are available and cleanup accomplished.

In addition the concentrations of the other contaminants reported to be present in the soil at the site are not high enough to cause the site to be considered as an imminent hazard to public health.

In short it was felt that some immediate response to prevent young children from contact with the contaminated soil at this site is necessary.

Georgi A. Jones

March 23, 1984

John Robinson, Mayor
Village of Rock Creek
3101 Lawton Avenue
Rock Creek, Ohio 44084

Dear Mayor Robinson:

I have been informed by you and others in the Village of Rock Creek that there are two major concerns about the construction of a fence around the Old Mill Site by the U.S. Environmental Protection Agency (U.S. EPA).

I recognize your concern that this site could become a storage site for hazardous wastes from other Superfund sites or private sources. The U.S. EPA has no intention of allowing this to happen. Federal and State laws require that specific conditions be met before a site can be authorized to accept hazardous wastes. No one can operate a hazardous waste site in the State of Ohio without receiving U.S. EPA and Ohio EPA permits to do so. The Old Mill site, even with a fence, does not meet either State or Federal permit requirements, and public funds will not be expended to construct a hazardous waste storage facility there. In any case, public participation would be required if such a permit were under consideration. Any unauthorized use of the site to store hazardous wastes will be met with appropriate enforcement action.

I also understand that there is local concern about the final cleanup of the site. As you know, a remedial investigation of the site is under way to determine what further cleanup action is required. The construction of a fence will not stop nor will it hinder the investigation in any way. Final action at the site will be discussed with the public before any such action is taken.

The purpose of the fence is to protect public health by restricting public access, especially by children, to the site. A key will be left with you in case the need arises to enter the site.

CONCURRENCES								
SYMBOL	OSC							
SURNAME	[illegible]	[illegible]						
DATE	3/23	3/23/84						

If you have any further questions or concerns about this matter, please do not hesitate to contact me at (216) 835-5200.

Sincerely yours,

Joseph J. Fredle
On-Scene Coordinator

cc: Rebecca Kinkopf
2927 High Street
Rock Creek, Ohio 44084

Michael Wheeler, Ashtabula Disaster Services Agency

bcc: Mary Tyson, OSC, 5HR
Pierre Talbert, Assistant Regional Counsel
Vanessa Musgrave, 5PA
Robert Bowden, 5SCDO
Roger Hannahs, Ohio EPA-Columbus
Gary Gifford, Ohio EPA-Northeast District
Charles Hart, Ashtabula County Health Department

JJF/KB/VM/MT/PT/jc:3/23/84

	CONCURRENCES							
SYMBOL								
SURNAME								
DATE								

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

March 28, 1984

UPDATE

Old Mill Site

Dear Rock Creek Resident:

As you may be aware, the U.S. Environmental Protection Agency has been considering some action at the Old Mill site. This letter is to update you on our activities there.

A remedial investigation began August 1983 to determine the nature and extent of contamination at the site. The soil, groundwater, surface water, some private wells and sumps have been sampled. Data from that sampling will be compiled into a report for your information.

On January 31, 1984, a Regional Response Team (RRT) meeting was held. Members of the team include U.S. EPA, Ohio EPA, U.S. Geological Survey, Ohio Department of Health, Ashtabula County Department of Health and the technical team that assisted U.S. EPA during the drum removal in 1982. This group considered a recommendation from the Center for Disease Control and the Environmental Response Team to construct a fence around the site. Since areas of the site showed up to 8300 parts per million of lead, it was recommended to construct a fence to protect children from direct contact with contaminated soil. The team decided that U.S. EPA should prepare a proposal for constructing the fence.

On February 24, 1984, the U.S. EPA issued an order requiring Mr. Webb to construct a fence suitable to restrict access to the site to protect public health.

health. Under CERCLA, commonly called Superfund, the owners and operators of hazardous waste sites can be ordered to mitigate the threat to human health and the environment or be penalized if they refuse to comply with the orders.

Mr. Webb has been given an opportunity to confer with U.S. EPA about the order. Since he has indicated that he would not construct the fence, U.S. EPA will take the necessary action to install it. The date of construction has not yet been determined.

We recognize community concerns that this site could become a storage site for hazardous wastes. The Old Mill site, even with a fence, does not meet either State or Federal permit requirements which are necessary before a site may accept hazardous wastes. Public funds will not be expended to construct a hazardous waste storage facility there. If such a permit were ever under consideration, public participation and notification would be required. Any unauthorized use of the site to store hazardous wastes will be met with appropriate enforcement action.

There remains long term potential for migration of contamination off-site, through surface water runoff or percolation of contaminants into the water table. These potential problems are being addressed as part of the ongoing investigation and study of this site. The construction of the fence will not stop nor will it hinder the investigation in any way. Most sampling has been completed, and additional monitoring wells will be installed the week of the April 3, 1984. Once the study is complete, a report will be prepared to summarize all the data and offer recommendations for action. This report will be available and discussed with the public before any action is taken.

If you have any concerns or questions regarding the site or the study being conducted there, please contact me at U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604, (312) 886-6128.

Sincerely,

Vanessa Musgrave

Vanessa Musgrave
Superfund Community Relations Coordinator

APPENDIX N

COMMUNITY RELATIONS PLAN

COMMUNITY RELATIONS PLAN

OLD MILL FACILITY

ROCK CREEK, OHIO

This stage I community relations plan outlines activities to be in conjunction with a Superfund remedial action (Remedial Investigation/Feasibility Study) at the Old Mill facility in Rock Creek, Ohio. U.S. EPA will have the lead responsibility for technical and community relations work, working in close cooperation with the Ohio EPA and other concerned state and local officials. This plan can be updated and revised in response to any events affecting the timetable for the project and/or citizen needs or concerns.

A. BACKGROUND AND KEY ISSUES

1. Facility History

The facility consists of a site located on Hill Street in Rock Creek, Ohio (Ashtabula County) owned by Ben Henfield, Inc. (filed bankruptcy) operated by Jack Webb and an adjacent area owned by Mr. Kraus. The facility, located near a number of residences and a school, includes an old grain elevator complex consisting of several old wooden structures and several silos. Mr. Webb's operation at the facility involved the use of solvents in the manufacture of potting soil. Peat moss was processed with a polymer and other materials. Webb also collected and had remaining on site about 1,250 55-gallon drums. During his operation he stored drums on the Kraus property, accumulating 52 drums there.

Numerous citizen complaints were received about odors from the site in 1980. Concerns were also voiced about the threat of fire and/or explosion.

Emergency Response team composite sampling of the drums in October 1980, revealed that many drums appeared to contain resins, solvents, and oils. Drums began leaking in 1981, causing chemical runoff to nearby small streams.

On November 6, 1981, $50,000 in immediate removal funds were allocated to accomplish the removal of flammable liquids from the Henfield property. During the next several weeks drum sampling and compatibility testing were undertaken. A severe winter caused freezing of the drums, making removal impossible. In addition, difficulties were encountered in locating disposal sites. However, by summer's end approximately 500 drums and their contents had been removed through the work with Ohio EPA and generators (companies considered responsible for waste generation or transportation; and/or owners and operators of the facility).

In July, 1980 results of analysis done on a composite sample of all drums left on the Henfield property showed 72% xylene and 625ppm PCBs.

Sampling was undertaken in September 1982 to determine which barrels contained PCBs and in what concentrations. Analyses indicated that over 50 drums contained PCBs in concentrations greater than 50ppm. Approximately $35,000 remained from the $50,000 obligation. It had become obvious that because of the presence and PCBs and the need to remove the 52 drums from the Kraus property, the removal action was going to require significantly more funds.

On September 20, 1982, a Regional Response Team meeting was convened in Ashtabula and the decision was made to request an additional $106,000 to complete a surface cleanup of the site.

On October 1, U.S. EPA announced approval of the funding request. Removal work, under the new obligation ceiling, began on October 4, and by October 19, all drummed material had been removed from the facility, (this included both the Henfield and Kraus property.)

2. Citizen Concern

Citizens in Ashtabula county have a high degree of interest in and experience with hazardous waste issues. (Laskin/Poplar Oil, Fields Brook, New Lyme Landfill, Big D Campground are other NPL facilities in Ashtabula county.) Local and Cleveland media coverage of hazardous waste issues has been extensive.

Rock Creek area residents became deeply frustrated with the delay in cleaning up the facility. The discovery of PCBs in the drummed material and the discovery of a pile of drums on the Kraus property, served to increase citizen concern. On September 12, 1982, eight residents living near the Krause property, were treated at a local hospital for flu-like symptons blamed on exposure to fumes from the Kraus property drums.

U.S. EPA met with residents on September 20 to inform them of the emergency funding request. Over 100 residents attended the meeting, together with local officials, including the mayor. Several Cleveland television stations and local press were also present. Although citizens were relieved to hear of the funding request, they openly expressed frustration with U.S. EPA and vowed "not to end their fight" until contaminated soil, the Kraus property, health questions, and additional information on precise chemicals on the facility were resolved to their satisfaction.

As soon as the funding request was approved, U.S. EPA notified a number of the September 20 meeting's attendees by telephone.

A community relations plan was implemented during the subsequent removal, geared toward communicating cleanup information directly to residents. Progress reports by telephone were given to severl of the active citizens during the project. A fact

sheet was prepared summarizing the removal action during November and a meeting was held with residents on December 15 to review the cleanup. In December following the analysis of some sampling of citizens' private well water, a sample of city tap water was found to contain elevated levels of trihalomethanes. Although not connected with the facility citizens initially believed there might be a relationship between the tap water sample, contaminants found in two private wells and the faciilty.

At a January 20,1983, meeting U.S.EPA held with residents, an Ohio EPA water quality official participated, explaining to attendees his work with local water supply officials to correct the drinking water problem. Ohio EPA's retesting of the private wells concerned, and the proposed U.S. EPA remedial investigation and feasibility study at the facility were explained. A fact sheet detailing water sampling results was distributed.

Citizens were pleased with the cleanup and Region V's efforts to work with them and keep them informed. A good working relationship was built with the community during the removal action and is expected to continue during the remedial project.

During the time period the Old Mill removal action was underway, a County Task Force was organized to serve as a focal point for dealing with the hazardous waste problem in the country. The membership consists of residents living near several of the country's facilities, including Old Mill, Laskin/Poplar Oil and Fields Brook, a county commissioner and county health department representative. Kathy Takacs and Mary Puchein represent the Old Mill facility on the Task Force. They will serve as the contacts for keeping the members informed about our actions at the facility.

Key Issues and Current Concerns

a) Much of the intensity of community concern has abated with the completed removal action. Rock Creek residents also seem to feel their concerns will be listened to by U.S. EPA. Recent rumors have been to circulating to the effect that the facility had been removed from the NPL. Citizens were reassured by Region V that such was not the case and that we were on schedule with necessary steps leading up to the RI/FS.

b) Residents are concerned about any potential long term health effects that might be associated with the facility. The Ohio Department of Health plans to follow up with reinterviewing citizens living near the facility.

c) Residents concerns now largely focus on the possible extent of any groundwater contamination. They are anxious to see the RI/FS get under way.

B. OBJECTIVES OF THE COMMUNITY RELATIONS PLAN

The objectives of the community relations plan are:

1. Ensure that accurate information is disseminated to the media, local officials and citizens on a timely basis.

2. Ensure that citizens have an opportunity to express concerns and ask questions before issues develop into controversies or become distorted through rumor or misinformation.

3. Present the affected community with the results of our remedial investigation as soon as possible following its conclusion and analysis. A clear explanation, in terms that can be understood by the community, of the remedial investigation results must be provided to the residents in both oral and written form at the time the report is released. (A community meeting will provide the forum for this.) The same procedure should be followed following the conclusion of the feasibility study, prior to the three week comment period.

4. Ensure the recently formed Ashtabula County Hazardous Waste Task Force is briefed informally on activities and progress as the project progresses.

5. Closely coordinate the release of information (particularly test results) with other involved agencies and ensure that local officials and any directly affected residents are notified prior to giving the information to the local media.

6. Convey a clear understanding of what can and can not be done--that is, the limitations, of Superfund so that the community has realistic expectations.

7. Preserve and build on the good working relationship we have achieved with the community. This county currently has five facilities on the NPL. Obviously, we and the other federal and state agencies involved will be conducting remedial action projects in this area for a considerable time. Any loss of credibility suffered as a result of poor community relations during this project will carry over to our efforts at the other facilities.

C. Community Relations Techniques

The following techniques are suggested to meet the objectives of this community relations plan:

Technique	Objective
1. Press Releases	To provide accurate and timely information to community and regional media regarding plans, status and developments throughout the RI/FS.
2. Fact Sheets	Provide a channel of factual information directly from U.S. EPA to all those persons interested and concerned about the facility. (Much information concerning the site and U.S. EPA's activity or intentions tends to surface as rumor in the community and local media has in the past used citizen interviews as a basis for stories. Coverage has been inaccurate at times.)
3. Community Meetings	Provide the community with an opportunity to meet face-to-face with the u.S. EPA and other involved state agency personnel to be briefed on remedial investigation findings, structure of feasibility study, findings of feasibility study, and selection of a final remedy. These meetings will also offer an opportunity for citizens to air their concerns, ideas and suggestions. The affected community will be provided a 3-week comment period following completion of the RI/FS to offer comments on the selected alternative.
4. Coordination with Ashtabula County Hazardous Waste Task Force	To ensure the Task Force is kept informed informed of plans and progress. This coordination will most likely be done informally by telephone.
5. Informal briefings and updates for local officials and citizens (by telephone)	Provide a direct link to U.S. EPA for citizens so that they have a focal point for exchanging information and expressing concerns. This approach has been used successfully over the past six months.

OLD MILL FACILITY COMMUNITY RELATIONS PLAN SCHEDULE

TECHNICAL ELEMENTS

Community Relations Activities	(7 months) Remedial Investigation *May, 83 June,July,Aug.,Oct., Nov.	(5 Months) Feasibility Study Dec., Jan, '84. Feb.March,Apr. M
PRESS RELEASE	*---------- *	---------- *----*
FACT SHEET	*---additional, as required---- *	----------as required--- *----*
	*	* *
COMMUNITY MEETING	*---------- *	meetings will be held if need arises * *
COORDINATION WITH ASHTABULA COUNTY TASK FORCE AND OTHER AGENCIES	----------Ongoing----------	----------Ongoing----------
INFORMAL BRIEFINGS AND UPDATES FOR LOCAL OFFICIALS & CITIZENS (PRIMARILY BY PHONE)	----------Ongoing----------	----------Ongoing----------

E. Staffing Plan for Community Relations Plan

* Date	Activity	Staff Responsibility	Workhours
5/1, 12/1	Press Releases	Robert Hartian	15
4/30, 6/15			
5/1, 12/1	Fact Sheets	M. Carlson	40
4/30, 6/15		G. Kulma	16
5/1, 12/1, 4/30	Community Meetings	M. Carlson U.S. EPA	75
6/15		G. Kulma, U.S. EPA	60
		L. Roggenkamp, OEPA	40
		R. Hannahs, OEPA	40
		Peter McCumiskey	60
Ongoing	(Coordination (with Ashtabula (County Task (Force and other (agencies.	(M. Carlson primary contact.) (Other U.S. EPA and OEPA staff as required.)	
Ongoing	(Briefings for (local officials (and citizens (by phone.	M. Carlson	

* Dates are approximate. They will be changed to coincide with technical activities as soon as more precise information is available regarding the schedule of work.

F. OFFICIALS, CITIZENS, MEDIA

Local Officials	Affiliation	Phone Numbers
~~Walter Brown~~ John Robinson	Mayor, Rock Creek	(216) 563-3257
Donald Dietrich	Morgan Township Trustee	(216) 563-3233
Peter Jansen	" " "	(216) 474-6000 or (216) 466-3835
Joseph Dirsh	" " "	(216) 563-3536 or (216) 563-3767
Robert Schultz	Rock Creek Village Councilman	(216) 563-3171
Kenneth Brown	" " " "(Mayor's son)	(216) 563-3257
Earl Collins	" " " "	(216) 563-5620
Mary Puchein	" " " "	(216) 563-3977
Walter Johnson	" " " "	
George Stoffel	" " " "	
James Timonere	Rock Creek Village Solicitor	
Charles Hart	Ashtabula County Health Dept.	
Chief Laverne Goodge	Morgan Volunteer Fire Dept.	
Dana Kincaid	Water Board	
Harold Christian	County Commissioner	
Peter Jaracci	County Commissioner	
Al Mackay	Contact for Ashtabula County Hazardous Waste Task Force County Commissioner	(216) 576-2040
Mike Wheeler	Ashtabula County Disaster Services Chief	
State Officials		
Roger Hannahs	OEPA, Div. of Hazardous Materials Mgmt. (DHMM)	(614) 462-6747
Deborah Berg	OEPA, Northeast District Office, Twinsburg	(216) 425-9171
Lorey Roggenkamp	OEPA, DHMM, Community Relations	(614) 462-6743
Robert Indian	Ohio Dept. of Health	(614) 466-0281
Federal Officials		
Gregg Kulma	U.S. EPA, OSC	(312) 886-6941
Richard Bartelt	U.S. EPA, Chief, Remedial Response Branch	(312) 353-9773
Marcia Carlson	U.S. EPA, Community Relations Coordinator	(312) 886-6873
M. E. Lynch	U.S. EPA, Congressional Liasional	(312) 353-3018
Dennis B. Eckert	U.S. Congressman	
Carol Haslett	Office of Congressman Eckart	(312) 522-2056
John Glenn	U.S. Senator	(216) 293-7095
Pat Bluso	Office of Senator Glenn	
Howard Metzenbaum	U.S. Senator	(216) 293-7272
Ladd Anthony	Office of Senator Metzenbaum	
Peter McCumisky	U.S. EPA/Center for Disease Control Liaison	(312) 886-3005

Citizens

Arlene Frederick	Citizen	(216) 563-3700
Katherine & Ed Takacs	"	563-3908
Mary Pucheln	"	563-3977
Mike & Barb Hall	"	563-5319
Diane Craig	"	563-3741
Laverne Marsch	"	563-3741
Bill & Brenda Allison	"	563-4500
Dollie Hall	"	563-3069
Cheryl Mead	"	563-5909
Mary Herman	"	563-5427
Diane & Wayne Thompson	"	563-5421
Dorothy Highlander	"	563-3360
Beverly Kawalec	"	563-3063
Merton & Susan Booth	"	563-3063
Frank Mager	"	563-3718
John Hanyok	"	563-3718
Estella Mager	"	563-5442
Rush & Carol Bevins	"	563-3020
Ed Koziol	"	563-5257
Okelene & Mike Miller	"	563-3157
Sue Schultz	"	563-3171
Roberta McIntyre	"	563-5713
Jean Brand	"	563-3475
Joy Ebersole	"	563-5241
Mrs. Gary Barnette	"	563-5202
Mr. & Mrs. James Hall	"	
Sheila Buehner	"	563-3817
Mr. & Mrs. Jack Diemer	"	563-2136
Leonard Markley	"	563-5633
Jill Vecchio	"	563-5913
Brenda Beckwith	"	563-3876
Marcia Lesko	"	563-3610
Neil Bevins	"	563-3904
Mary Herman	"	563-5427
Maxine Schreckengost	"	563-3516
Merton & Susan Booth	"	563-3063
Vern & Sue Hall	"	576-7516
John Hamjok	"	563-3718
John Homurng	"	563-3942
Ellen Hinshaw	"	858-2826
Ken Clark	"	563-3686
John Hayes	"	563-3779
Vicki Ritter	"	
Carol Collins	"	563-5620
Frank Lambert	"	563-1591
Andrew Nash	"	
Lynda Osborn	"	576-8424

Media	Affiliation	Phone Number
Bonna Savarise	Astabula Star-Beacon	(216) 576-4816
Dana Christie	WFUN Radio	" 992-6397
Martin Conoboy	Jefferson Gazette	" 576-9115
James Lawless	Cleveland Plain Dealer	" 344-4815

APPENDIX O

RRT MEETING MINUTES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 1, 1984

SUBJECT: Report on Meeting of Remedial Response Team (RRT) Concerning the Old Mill Superfund Site, Rock Creek, Ohio (Ashtabula County)

FROM: Vanessa Musgrave

TO: Kathy Brown, Director
Office of Public Affairs

Meeting of the RRT was called by the On-Scene Coordinator for Immediate Removals, Joe Fredle, of the Eastern District Office (EDO). It was held at EDO, 25089 Center Ridge Road, West Lake, Ohio, on Tuesday, January 31, 1984, at 1:00 p.m. Those in attendance are listed on an attachment.

The topic of discussion was to determine if a fence should be erected on the Old Mill site to prevent access of the public. Children and teenagers are regularly seen on the property in various activities. Funding for the fence was also an issue.

There is public support for a fence on site. Thre was also overwhelming support from all levels of government to erect the fence. HOwever, a memo from CDC appeared contradictory in assessing health effects of the site as it presently exists. As no one from CDC was able to attend this meeting, a call was placed to CDC, Atlanta, to discuss the matter. The opinion was confirmed by Dr. Mark McLanhan that a fence should be installed on site to protect the public and contain the remaining contaminated soil.

As to funding, Pierre Talbert, of the Regional Counsel's office, will check with generators about funds for the fence. Some generators have voluntarily removed some drums from the site, and may be willing to assist in this action. If not, supplemental funding will be requested for the fence as an immediate removal action. The estimated cost of the fence is $10,000. Letters supporting this action are forthcoming from various Ohio agencies.

Prior to discussion of these issues, Joe gave a history of the site to update everyone. Bob Bowden, Chief of the Spills Section in Chicago and co-chair of the RRT, gave some background on the RRT. The function of the RRT is to:

1. provide technical advice to the OSCs.
2. consist of both State and Federal agency representatives, chaired by the agency which has most responsibility or authority over problem.
3. may consist of Coast Guard, DOT, disaster agencies, EPAs, Interior, equivalent State agencies, departments for waterways, CDC, fire and police departments, agriculture, etc.
4. local governments are included on site-by-site basis.
5. usually called by EPA by OSC for immediate removals.

There is an RRT in each EPA region, with managers in Headquarters.

cc: Mary Pat Tyson Joe Fredle Richard Bartelt John Perrecone
Pierre Talbert Bob Bowden Greg Vanderlaan

TABLE 1

ATTENDEES AT THE REGIONAL RESPONSE TEAM MEETING

HELD ON JANUARY 31, 1984 IN REGARDS TO THE

OLD MILL SITE, ROCK CREEK, OHIO

NAME	AFFILIATION
Robert J. Bowden - RRT Chair	U.S. EPA - Central District Office
Jeffry T. deRoche	U.S. Geological Survey
Joseph Fredle	U.S. EPA - Eastern District Office
Gary Gifford	OEPA - Northeast District Office
Roger Hannahs	Ohio EPA - Central Office
Chuck Hart	Ashtabula Co. Health Dept.
Vanessa Musgrave	U.S. EPA - Community Relations
Dan Papcke	U.S. EPA - Eastern District Office
George R. Prince	EPA - Emergency Response Team
Allan Razem	U.S. Geological Survey
Scott Springer	Roy F. Weston, Inc. - Technical Assistance Team
Pierre Talbert	U.S. EPA - Office of Regional Counsel
Mary Tyson	U.S. EPA - Remedial Response Branch
A. R. Winklhofer	U.S. EPA - Eastern District Office